ENMARC
ENVIRONMENTAL MANAGEMENT AND RESOURCE CONSULTANTS, INC.
P.O. Box 578 • Lemont, IL 60439
630. 257. 9357 • 888. 436. 6272 • Fax 630. 257. 1650

September 24, 2001 Certified Mail No.: 7000 0520 0015 3518 0395

Ms. Anita Boseman
On-Scene Coordinator
US Environmental Protection Agency
Emergency Response Branch (SE5J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

RE: SERVICE WELDING & SHIP BUILDING
NE CANAL BANK ROAD, LEMONT, IL

REVISED (9/2001) SPCC PLAN

Dear Ms. Boseman:

Pursuant to the Agency's correspondence dated August 17, 2001, ENMARC, under the direction of Service Welding and Ship Building has amended the facility's SPCC Plan herein.

The Plan has been reviewed and certified by a Professional Engineer. Additionally, for ease of review, ENMARC has provided an individual response to each of the items identified in Attachment A to the Agency's subject correspondence.

Should you have any further questions regarding this matter, feel free to contact myself @ 630/257-9357, or Mr. Dennis Egan @ 630/7390947.

Sincerely,

Jeanette Virgilio
Environmental Engineer

cc: Mr. Dennis Egan, Service Welding & Ship Building, P.O. Box 669, Lemont, IL 60439

Service Welding and Ship Building
NE Canal Bank Road, Lemont, Illinois

SPILL PREVENTION, COUNTERMEASURES AND CONTROL PLAN (9/2001)
RESPONSES TO ALLEGED VIOLATIONS OUTLINED IN USEPA'S
8/17/2001 CORRESPONDENCE

The following is an individual response by Service Welding to each of the USEPA's alleged violations outline in correspondence dated 8/17/2001.

USEPA ALLEGED DEFICIENCY 1: EGAN RESPONSE #4 AND #24

(e) (2) Failure to provide complete discussions and/or implement requirements pertaining to Bulk Storage Tanks

(ii) Failure to provide secondary containment for the largest single tank plus an allowance for precipitation.

**Secondary containment is required for all tanks, whether empty or full tanks, unless empty tanks have been properly decommissioned.* Decommissioning may include but, is not limited to removal of all product, and disconnection of piping to render the tank incapable of storing oil or and the tanks must be completely taken out of operation to be properly decommissioned. Also, the containment must be free of water, which, if present will reduce the containment capacity, and or may decay the bottom of the tank. A written log for drainage schedule is required.*

**Operations on the eastern peninsula lack adequate secondary containment. Therefore, the above also applies. If a tank is currently being used, even if temporarily [e.g. the soapstock storage tanks], or if future use is still possible [bulk storage tanks in eastern peninsula], secondary containment must be provided.*

Service Welding's Response:

Within the primary containment area in which Tanks B1, B2 and U1 through U18 are located, there is adequate containment capacity for the storage of all of these tanks as demonstrated by the containment calculations included under Section C.1 (on pages 3 - 5). Service Welding intends to only contain four permanent active tanks (B1, B2, U1 and U2) for storage. The remaining tanks are for emergency backup purposes in which storage will be limited.

The four upright tanks labeled U19 through U22 are additionally intended for emergency backup storage. However, due to the lack of adequate containment, one of these tanks is proposed to be temporarily decommission (i.e., removed from the containment area) until the existing containment system can be expanded to accommodate the proper containment capacity.

As indicated within the SPCC Plan under Section C.1 (pages 3-5), during or immediately after each rain event, all containment areas will be drained of any stormwater accumulation. Furthermore, under Section E.5 (page 20), the plant is inspected on a daily basis, which includes inspection of the tanks and containment area for the absence of stormwater accumulation.

With regard to written logs of these discharge events, rain events can be monitored by contact with the Illinois State Climatologist Office. Information regarding rainfall events can be accessed by their website: www.sws.uiuc.edu/atmos/statecli/. This information has been included in the SPCC Plan under Section E.2.iii.d. (page 17) to address the record -keeping of these events. Service Welding believes that the requirements of this part have been met.

As stated in the SPCC Plan (refer to Page 1, General Facility Description), and re-iterated here, there are no storage operation on the eastern peninsula. All storage operations are located solely on the Western peninsula of the Property.

USEPA ALLEGED DEFICIENCY 2: EGAN RESPONSE #8

(viii) Failure to implement fail-safe engineering techniques on the tanks with one of the following:

(A) High liquid level alarms with an audible or visual signal;
(B) High liquid level pump cutoff devices;
(C) Direct audible or code signal between the tank gauger and pumping station;

**As indicated above, this requirement applies to all tanks until properly decommissioned. As to boiler and vehicle tank operation, some means of detecting level must be used even if it is only the method identified in VIII(C) above, e.g. your plan must state in detail the procedures by which this operation will be "continuously monitored" as indicated in your response. Such continuous monitoring must in turn satisfy viii. C requirement of having direct communication between two individuals manning the gauger and the pumping station. Absent this, you must demonstrate the impracticability of implementing any of the techniques specified in the regulation.*

Service Welding's Response:
The SPCC Plan (specifically Section E.2.viii, page 18) has been amended to include more detail regarding the continuous monitoring of loading/unloading operations to prevent overfilling of the tanks.

DEFICIENCY 3: EGAN RESPONSE #14

(e) (4) Failure to provide complete discussions and/or implement requirements pertaining to Facility Tank Truck Loading/Unloading Rack.

(i) Failure to meet the minimum requirements and regulation established by the Department of Transportation regarding tank car and tank truck loading and unloading procedures.

**U.S.EPA is fully aware of the DOT regulations. However, it is necessary to state in the Plan that the facility is in compliance with this requirement e.g., facility meets minimum requirements set by DOT. tell us you follow the DOT requirements.*

Service Welding's Response:

The SPCC Plan has been modified under Section E.4.i. (page 19) to state compliance with DOT requirements.

USEPA DEFICIENCY 4: EGAN RESPONSE #15

(ii) Failure to provide a quick drainage system with a containment valve greater than the largest compartment of any tank car or truck where drainage does not flow into a catchment basin or a treatment facility.

**Please identify the catchment volumes of the "containment areas" and the maximum compartment capacity of each tank truck utilized at each loading rack area.*

Service Welding's Response:

The two unloading areas at the plant are that west of the primary upright tank storage area and that west of the three small fuel tanks. The maximum compartment capacity of the tanker trucks utilized for transfer operations is 3000 gals. The SPCC Plan has been modified to identify this (refer to Section E.4.ii, page 20). Service Welding believes that the SPCC Plan has already demonstrated that the there is adequate containment in the upright tanks' unloading area and believes that the unloading area for the small fuel tanks is situated in such a manner as to divert any released materials until such time emergency response efforts can be initiated to contain and cleanup the released materials. Therefore, the objectives of these regulations from tanker unloading has been met. Service Welding believes that based upon the structures and procedures adopted by the enclosed Plan, no releases of materials will reach the surrounding waterways.

USEPA DEFICIENCY 5: EGAN RESPONSE #19:

(e) (9) Security (excluding oil production facilities)

(i) Failure to securely lock master flow and drain valves in the closed position or any other valves that will permit direct outward flow of the tanks' contents to the surface when in non-operating or non-standby status.

All drain valves must be locked when facility is not in operation. Please state in Plan if you meet this requirement.

Service Welding's Response:

The SPCC Plan has been amended to clarify the 24 hour operational status of the facility (refer to Section E.6.ii., page 21). Furthermore, as indicated under E.6.i. (page 21), the facility maintains 24 hour security personnel to ensure no unauthorized access.

USEPA DEFICIENCY 6: SCOPE OF PLAN:

**During site inspections, many portable tanks were stored in the "Western Peninsula" and need to be addressed in the Plan, or as stated above, properly decommissioned. If retained (even if empty), the inventory, locations and secondary containment, etc. for these portable tanks must be covered per the SPCC regulations. Therefore, since the numbering of the tanks changed, please provide updated list of all tanks (even those that may be empty) including each tank number, volume/capacity; location (via indicating on facility map) and secondary containment. If secondary containment includes the use of facility topography, the plan must identify and prove that the rock is not impervious. Remember, bedrock is not impervious by definition. There are cracks. Also, if facility drainage is to the center, the plan must also provide in detail the procedures for collection of release, rainwater...., where stored and the means to address overflow, a pond or sump.*

Service Welding's Response:

Only one portable tank is maintained on the Western peninsula. This 3000 gal. tanker is used for boiler fuel barge to tank transfers as necessary. When not in use the tanker is stored empty at various designated locations on the Western peninsula. The remaining portable tankers that are on-site are actually damaged tankers that are not usable, i.e., broken down, imploded, etc. that the facility intends to either repair or scrap at a future date. Therefore, the mere state of their damage rendering the tank unusable, additionally meets the definition of decommissioned.

For ease of review, the tanks have been renumbered in the SPCC Plan under Section E.2, page 16 and under Attachment 1, Site Topographic Location Map with the original numbering system adopted under the 12/96 SPCC Plan. The requirements of the SPCC regulations state under Section 112.7 that *"appropriate containment and/or diversionary structures or equipment to prevent discharge oil from reaching a navigable water course should be provided."* Service Welding believes that the combination of the general nature of the natural topography, underlying bedrock and emergency (release) response procedures outlined in the SPCC will provide an adequate means of initial containment to allow for response action to further contain any releases which will subsequently meet the ultimate goal of these regulations: prevention of oil releases into navigable waterways.

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SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN

PREPARED FOR:

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank
Lemont, Illinois 60439

PREPARED BY:

ENvironmental Management And
Resource Consultants, Inc. (ENMARC)
229 E. Custer St.
Lemont, Illinois 60439

September 2001

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont, Illinois

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN
(September 2001)

TABLE OF CONTENTS

LIST OF ATTACHMENTS

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

FACILITY NAME: Service Welding and Ship Building

FACILITY ADDRESS: NE Canal Bank Road (Mailing Address: P.O. Box 669)

Lemont, Illinois 60439

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons **and** do the operations include over water transfer of oil to or from vessel?

   YES X NO ____

2. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons **and** is the facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?

   YES ____ NO X

3. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons **and** is the facility located at a distance (as calculated using the appropriate formula* in Attachment C-III or an alternative formula considered acceptable by the RA) such that a discharge from the facility cold cause injury to an environmentally sensitive area as defined in Appendix D?

   YES ____ NO X

4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons **and** is the facility located at a distance (as calculated using the appropriate formula* in Attachment C-III or an alternative formula considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?

   YES ____ NO X

5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons **and** within the past 5 years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

   YES ____ NO X

*If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate and complete.

Signature

Owner/President
Title

Dennis Egan
Name (Please Type or Print)

9-24-01
Date

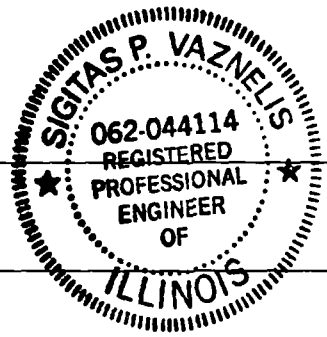
Service Welding and Ship Building
NE Canal Bank Road
Lemont, Illinois 60439

Spill Prevention, Control and Countermeasures Plan
(SPCC Plan, 9/2001)

PROFESSIONAL ENGINEER CERTIFICATION

I hereby certify that I have reviewed and evaluated the enclosed SPCC Plan and am familiar with the provisions of 40 CFR, Part 112, and attest that the SPCC Plan has been prepared in accordance with good engineering practices.

Signature: _____



Name: Sigitas P. Vaznelis

Title: Professional Engineer, Morris Engineering, Inc.

Registration Number: 062-044114 (Illinois) SEAL:

Date: 9-24-2001

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont, Illinois

SPILL PREVENTION, CONTROL AND COUNTERMEASURE (SPCC) PLAN
(September 2001)

This SPCC Plan has been prepared in accordance with appropriate engineering practices, and has the full approval of management at a level of authority to commit the necessary resources. This SPCC Plan has been developed in accordance with 40 CFR Part 112.7.

Copies of this Plan will be maintained in the Supervisor's office on-site. Additionally, each SPCC Emergency Coordinator will keep a copy at the office and at home.

GENERAL FACILITY DESCRIPTION:

Name of Facility:	Service Welding and Ship Building (herein after referenced as Service Welding)
Location of Facility:	The north bank of the Chicago Sanitary and Ship Canal, 1/2 mile east of the Lemont Road bridge on the south side of the DesPlaines River. Refer to the Regional Topographic Site Location Map incorporated under Attachment 1.
Mailing Address of Facility:	P.O. Box 669 Lemont, Illinois 60439 Phone Number: (708)739-6660
Type of Facility:	Bulk Storage of Petroleum Boiler Fuel, Gasoline and Diesel (for on-site fueling operations); and Temporary Storage of Edible Grade, Vegetable-Based Oil (Common Name: Soapstock) -- Refer to Attachment 2 for a copy of the Material Safety Data Sheet(s) for the products currently stored on-site.
Facility Layout:	Refer to the Site Plan Map incorporated under Attachment 1. Only the portion of the facility west of the barge slip is utilized for petroleum storage. There are no storage operations located on the property east of the barge slip.
Additional Information:	Service Welding also engages in operations specific to commercial tugboat and barge maintenance and repairs. An additional operation located at the subject location consists of tugboat and barge transportation (fleet) operations owned and operated by Egan Marine Corporation.

A. Written description of spills, corrective actions taken and plans for preventing recurrence

(for spill events within last 12 months).

There has been no major releases to a navigable waterway within the last 12 months.

The small spills which occur are collected using portable pumps and are reintroduced to the product tanks. Residues can additionally be collected by means of manual removal with oil dry, shovels, absorbent pads/booms, etc... These types of deminimus spill cleanup residues, if generated, will be placed for temporary storage in drums, pending off-site transport for disposal. Service Welding is additionally implementing daily and weekly inspection procedures to ensure better housekeeping practices and minimize releases into the environment.

Service Welding has minimized the their tank storage capacity to only include those tanks necessary for their commercial tugboat and barge maintenance/repair operations. The soapstock materials are intended for temporary storage pending procurement of a fair market price for this product. The remaining tanks have been emptied and will not be placed back into operation.

B. Prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each major type of failure.

Due to the topography of the plant, any release from the 7 - 40,000 gallon ("lay down") tanks used temporarily to store edible grade oil (soapstock) product will flow to the center of the plant which contains a depression within the limestone bedrock with an approximate 1.5 - 2' depth. This structure acts as one of the primary containment system for these storage tanks. Refer to the Site Plan Map (incorporated under Attachment 1) which illustrates the contouring of the storage plant operations. The largest tank within this containment is approximately 40,000 gallons, whereas the current volume of the containment area is in excess of 100,000 gallons. Furthermore, Service Welding has constructed additional concrete diversion structures around the north and east sides of the 40,000 gallon product storage tanks area to prohibit the release of stored materials into the barge slip/Canal.

There are 4 - 24,000 gallon tanks (B1, B2, U9 and U10) that have been chosen to remain in primary operatio for the storage of boiler fuel for on-site consumptive use. The remaining tanks are for emergency storage purposes only. However, all of these tanks are located within a concrete secondary containment structure which will contain the entire contents of the largest single tank plus sufficient free board to allow for precipitation. (Also note: during and/or immediately after rainfalls, the precipitation accumulation within all of the secondary containment structures is removed to ensure proper containment remains available).

The petroleum motor fuel tanks dedicated for on-site vehicle fueling purposes have been installed within a concrete secondary containment structure to contain all spills and releases from the tanks.

With regards to the direction and flow rate of the Chicago Ship and Sanitary Canal (Canal), the canal flows from east to west at an average rate of approximately 0.5 miles per hour.

C. Appropriate containment and/or diversionary structures or equipment to prevent discharged oil from reaching a navigable water course for Onshore facilities:

1. Dikes, berms or retaining walls sufficiently impervious to contain spilled oil;

The soapstock temporary tank storage area is currently contained by means of a two (2) foot high concrete retaining/diversion wall and a depressed area within the bedrock which is the central area of the primary tank storage. This depressed area alone will contain a minimum of 110% of the largest tank (@ 40,000 gallons). The contouring beneath the soapstock storage areas indicate the primary flow direction of spills and releases into the depressed containment area.

Below are the calculations demonstrating sufficient capacity of the current soapstock product containment system at this location:

Est. Capacity of Depressed Area/Soapstock Temporary Storage :

ELEV	AREA (SF)	VOLUME (CF)	VOLUME (GAL.)
98.15	0.0	0.0	0.0
98.50	3.315	580	4,338
99.00	11,976	4,402.75	32,933
99.50	18,963	12,137.50	90,789
		Total Volume:	**128,060 Gallons**

Displacement of Tanks
Not Applicable -- the laydown tanks are supported by steel "saddle" structures which place the tanks approximately 24" above ground. The volume displacement of the steel legs of the saddle supports are negligible.

Rainfall accumulation calculations:

Total Area @ 30,942.32 sq.ft. x 2.9 "(ave. Monthly Rainfall*; 0.242 ft.) = 7477.72 cf x 7.48 gal./cf. = 55,933.40 gal.

Available containment capacity = Total Volume @ 128,060 gallons less Rainfall Volume @ 55,933.40 gal. = 72,126.60 gallons (which exceeds the capacity of the largest tank @ 44,400 gallons).

Furthermore, as previously described under Item I., Service Welding has installed additional (concrete) containment/diversion structures to ensure the containment of spills and releases from the temporary bulk (soapstock) storage operations. Service Welding additionally removes rainwater accumulation from each containment area immediately following a rain event.

Primary Concrete Containment Area/Boiler Fuel Storage

In reference to the 20 upright, (15,000 - 24,000 gallon) boiler fuel product storage tanks, only 4 will remain in primary active operation. The remaining 16 tanks will be used for emergency back-up storage only. The emergency backup storage is only anticipated to occur for a few days at any one time. Regardless, Service Welding maintains a concrete secondary containment structure around these upright tanks. Below is the calculation representing the containment capacity of each containment structure surrounding each pair of boiler fuel tanks:

Dimensions: 30' Wide x 74' Long (= 2220 sq. Ft.) x 3.42 ' High	
Gross Volume = 7,592.40 cubic feet; (x 7.48) =	56,791 gallons
Displacement of Tanks = 10 x Π (5ft.)^2 max radius x 3.42 ft. x 7.48 =	20,082 gallons

Total Available Volume = 36,709 gallons

Rainfall accumulation calculations:

Total Area @ 2220 sq.ft. x 2.9 "(ave. Monthly Rainfall*; 0.242 ft.) = 536.5 cf x 7.48 gal./cf. = 4,013 gal.

Available containment capacity = Total Volume @ 36,709 gallons less Rainfall Volume @ 4,013 gal. = 32,696 gallons; which exceeds the capacity of the largest tank @ 24,000 gallons and allows for freeboard to accommodate precipitation. (Additionally note, due to the location of the overflow manways on the upright tanks, there is actually only 20,000 gallons of capacity in these tanks).

Concrete Containment Area – 4 Upright Storage Tanks

With regard to the four upright storage tanks, Service Welding intends to use these tanks for emergency backup storage purposes only. At present, the secondary containment system is proposed for expansion to accommodate emergency backup storage in all four tanks. Until the containment system is expanded, one of the tanks will be properly decommissioned (removed from the tank system area).

Below are the calculations to document the interim containment capacity for the three tanks:

Dimensions: 29' Wide x 40' Long (= 1160 sq.ft.) x 3.33 ' High	
Gross Volume = 3,863 cubic feet; (x 7.48) =	28,895 gallons
Displacement of Tanks = 3 x Π (5 ft.)^2 max radius x 3.33 ft. x 7.48 =	5,865 gallons

Total Available Volume = 23,029 gallons

Rainfall accumulation calculations:

Total Area @ 1160 sq.ft. x 2.9 "(ave. Monthly Rainfall*; 0.242 ft.) = 536.5 cf x 7.48 gal./cf. = 2,082 gal.

Available containment capacity = Total Volume @ 23,029 gallons less Rainfall Volume @ 2082 gal. = 20,947 gallons which exceeds the capacity of the largest tank @ 20,000 gallons (based upon the overflow manway locations on the tanks) and allows for freeboard to accommodate precipitation.

Below are the calculations to document the final containment capacity for all four tanks:

Initially, the containment dimensions will have to be expanded by approx. 8', i.e., 29' x 48'

Dimensions: 29' Wide x 48' Long (= 1392 sq. ft.) x 3.33' High
Gross Volume = 4635.36 cubic feet; (x 7.48) = 34,672.49 gallons
Displacement of Tanks = 4 x Π $(5ft.)^2$ x 3.33 ft. x 7.48 = 7,821.24 gallons

Total Available Volume = 26,851 gallons

Rainfall accumulation calculations:

Total Area @ 1392 sq.ft. x 2.9 "(ave. Monthly Rainfall*; 0.242 ft.) = 336.86 cf x 7.48 gal./cf. = 2519.71 gal.

Available containment capacity = Total Volume @ 26,851 gallons less Rainfall Volume @ 2,519.71 gal. = 24,331 gallons ,which exceeds the capacity of the largest tank capacity @ 20,000 gallons (the true tank capacity based upon placement of overflow manway) and allows for freeboard to accommodate precipitation.

Concrete Containment Area/Vehicle Fuel ASTs

Regarding the petroleum-based vehicle fueling operations, the current diesel and gasoline tanks are located within a concrete secondary containment structure. The current and proposed boiler fuel tanks are to be re-located to an area equipped with concrete secondary containment. Below are the calculations to demonstrate sufficient containment capacity for these petroleum fuel storage areas:

Vehicle Fuel Tanks: 24' x 15' x 22" Height = 660 cu. ft. = **4950 Gallons**
(Note: Because the tanks are elevated on steel structures, the volume displacement resulting from the steel support legs is negligible).

Rainfall accumulation calculations:

Total Area @ 360 sq.ft. x 2.9 "(ave. Monthly Rainfall*; 0.242 ft.) = 87.12 cf x 7.48 gal./cf. = 652 gal.

Available containment capacity = Total Volume @ 4,950 gallons less Rainfall Volume @ 652 gal. = 4298 gallons (which exceeds the volume of the largest tank @ 1500 gallons and allows for precipitation accumulation).

After each rainfall, all of the containment areas are drained of any stormwater accumulation. Additionally, the tanks and containment areas are inspected on a

daily basis to ensure all stormwater has been removed (refer to Section E.5. and Attachment 7).

*Note: Source of Date: www.worldclimate.com (Chicago, Cook County, IL)

2. Curbing;

   Refer to Item III. A. above.

3. Culverts, gutters or other drainage systems;

   None.

4. Weirs, booms or other barriers;

   Service Welding does not contain any permanent weirs, booms or other barriers other than the containment structures previously described.

   For purposes of responding to spills or releases, Service Welding maintains appropriate spill response equipment to ensure the expeditious containment and removal of all spills and releases. Refer to Attachment 3, for an inventory of all spill response equipment maintained on-site and their location within the plant.

5. Spill diversion ponds;

   None.

6. Retention ponds;

   None.

7. Sorbent materials;

   As referenced under Item 4. above.

D. Contingency Spill Response Measure

1. A strong oil spill contingency plan following the provision of 40 CFR part 109.

Due to the fact that Service Welding has adequate containment has established effective preparedness and prevention procedures as described herein, a Contingency Plan is not required. However, to ensure that major spills and releases of product materials stored on-site are prevented from discharging to a navigable waterway (the Chicago Ship and Sanitary Canal), Service Welding has elected to establish "in-house" procedures for responding to major spills and releases (i.e., spills and releases that occur or reach outside of the containment system) and has incorporated these procedures herein as part of the SPCC Plan.

Furthermore, because Service Welding shares this location with EMC, a barge and tugboat transportation services operation who by law is additionally mandated to develop emergency response procedures specific to spills or releases that occur as a result of the barging operations, Service Welding will rely on the expertise of EMC, who will be the entity responsible for responding to major spills or releases resulting from on-shore operations that do discharge to the Canal. The same procedures as outlined in EMC's emergency response plan will be implemented in the event a major release from the storage operations is discharged into the Canal. A copy of EMC's Emergency Response Plan(s) as required by 33 CFR Part 154 for the barge transfer and mobile facilities operations are incorporated under Attachment 4 and 5.

SPCC/Contingency Plan Response Procedures

i) Description of Alarm System and Procedures to Activate

Alarm System:

The on-site PA System will be used to identify an emergency, including implementation of the SPCC Contingency Spill Response Procedures herein.

The Emergency Coordinator will be immediately notified in order that implementation of the Contingency Plan can be initiated. The Emergency Coordinator will notify the appropriate Federal, State and local agencies, as necessary. At the sounding of the alarm, all plant personnel will cease their current activity and proceed to the office building or parking area and await further instruction.

ii.) Responsibilities of Emergency Coordinator:

Upon sounding of the alarm or notification of a supervisor, the on-site Emergency Coordinator or alternate will be notified of the emergency and become responsible for the implementation of the Contingency Plan.

In the event more than one designated Emergency Coordinator is on-site, the

ranking employee shall be in charge. All employees assigned emergency response duties will report to the Emergency Coordinator for their assignments.

The Emergency Coordinator's responsibilities include:

1. Being familiar with:
   a. The facility contingency plan;
   b. The facility operations and activities;
   c. The characteristics and locations of oil substances used or stored on-site;
   d. The physical layout of the facility; and
   e. The location of equipment, materials and records in the facility.

2. Coordinating the emergency response measures as described in this Plan

3. Completion of duties as described in this Plan.

The Emergency Coordinator(s) are authorized to commit the necessary resources, i.e., expend funds, hire contractors, and direct employees as necessary to implement the Contingency Plan.

iii.) Criteria for Implementing the Plan

Reasons for implementing the Contingency Plan may include but are not limited to:

Spills: Any spills of product materials occurring outside of the spill containment areas or structures.

Fire: All fires greater than incipient. Any fire which has the potential for escalating into a major fire, which may jeopardize the control of product materials stored on-site.

Explosions: Any explosion which has the potential for escalating into a major fire and involves product materials, and which jeopardizes the control of these materials.

iv.) Criteria for Assessing Environmental/Public Health Impact

In the event of a fire, explosion, and/or release of product materials to the water or soil outside of the containment systems, the Emergency Coordinator is required to make an assessment of the situation to determine what hazards, both physical and health, are present by the release of the material, and what risk the material hazards present to human health and the environment, both on and off of the site.

It is the Emergency Coordinator's first duty to identify the character, source, amount and extent of any released material. The Emergency Coordinator should estimate or determine, to the extent possible, the amount of material lost.

The Emergency Coordinator must make an assessment of the risk to human health and the environment. He must give consideration to:

- Physical and health hazards
- Prevailing weather conditions
- Likelihood of contaminant migration
- Run off of liquids to surface waters
- Location of human populations and their likelihood of exposure
- Determination of protective clothing and equipment to be used during response activities
- Amounts and concentrations of materials released to the environment
- Amount of time before the situation can be brought under control
- Likelihood of the initial incident escalating in severity

Service Welding always recommends that the Emergency Coordinator take the most conservative approach to the situation. As part of the assessment process, the Emergency Coordinator will need to determine the nature and severity of the spill event and if coordinating services need to be called in for support, and to what extent, if any, the Contingency Plan will be implemented.

The Emergency Coordinator will establish a command post/communication center from which the Emergency Coordinator directs operations and communicates with outside agencies, local authorities or support services. Any employee assigned to perform a duty on behalf of the Emergency Coordinator must do so in a responsible manner and limit his actions to those specifically assigned to him by the Emergency Coordinator.

v.) Emergency Services Notification Procedures:

In the event of a major release of oil substances (outside of the containment areas), the following persons, will be notified.

Emergency Coordinator	Telephone (Work)	(Home/Pager/Mobile)
Dennis Egan	630/739-6660	972-0948/419-6900/399-3366 (All "630" area code)
Daniel Egan	630/739/6660	972-1116/419-6907/975-6901 (All "630" area code)

If deemed necessary by the Emergency Coordinator, the following services as necessary will be contacted:

Coordinated Emergency Services	Telephone
Fire: Lemont Fire Dept.	911
Police: Lemont Police Dept.	911

Cook County Sheriff's Dept.	312-458-1000
Ambulance: Lemont Fire Dept.	630-257-2221
Trauma Center(s):	
Silver Cross Hospital	815-740-7050
Palos Community Hosp.	708-361-4500
Loyola Hosp.-Burn Ctr.	312-531-3000

Emergency Response Agencies	Telephone
National Response Center	800-424-8002
Illinois Emergency Services & Disaster Agency	217-782-7860
Metropolitan Water Reclamation District of Greater Chicago	312-751-5600
U.S. Coast Guard, Marine Safety Office Office, Chicago	312-353-1226

Emergency Response Contractor	Telephone
HERITAGE (Chicago)	1-800-487-7455 (24-Hour)

NOTE: **If the emergency coordinator determines that the facility has had a release, fire or explosion which could threaten human health or the environment outside the facility, he/she will immediately notify the National Response Center.**

The report should contain the following information:

- Name & telephone number of the reporter
- Name & address of the facility
- Time & type of incident
- Name & quantity of material(s) involved
- Extent of injuries, if any
- Possible hazards to human health or the environment outside of the facility
- Response efforts already initiated or planned

vi.) Emergency Response Procedures

In the event of a fire, explosion, or other major release of oil products outside of the containment area(s), the Emergency Coordinator will be contacted immediately and

shall assume responsibility for implementing the Contingency Plan and/or responding to the emergency as necessary. Any employee who discovers an emergency situation, shall immediately activate the alarm system, leave the immediate area and notify his supervisor or other responsible person and proceed to the office and/or parking lot following a safe route. The supervisor shall immediately notify the Emergency Coordinator as listed above.

Fire:

The fire department should always be summoned immediately to have trained professionals on hand or to respond if the fire has progressed beyond an incipient fire. If it is safe to do so, responding (trained) employees, under the direction of the Emergency Coordinator, may begin fire fighting measures. This includes:

- Application of portable or other fire extinguishing equipment;

- Removing or isolating materials which may contribute to perpetuating or to exacerbating the incident.

Should the fire escalate to a level beyond incipient, response procedures are to be given up to fire responders.

The Emergency Coordinator shall direct non-responding personnel to remove themselves to a place of safety, upwind of the incident. If evacuation is necessary, the evacuation procedures will be followed.

As soon as possible after the discovery of the fire, explosion, or major release, the Emergency Coordinator will order a controlled and orderly shut down of operations and processes. The Emergency Coordinator will also monitor processes or operations which were shutdown in response to the emergency for build-up of pressure, leaks, ruptures, etc., and initiate the rescue of injured employees, if it is safe to do so. The Emergency Coordinator shall also take steps to contain or prevent the runoff of impacted fire fighting water and the migration of product(s) involved in the incident by application of spill absorbent media or use of heavy equipment to construct temporary berms, and/or use of vacuum systems to intercept and remove any resulting migration of materials.

Upon resolution of the fire, the Emergency Coordinator shall initiate actions for the clean-up and decontamination of the site, and the equipment used to respond to the incident. The Emergency Coordinator will also provide for the characterization, treatment, storage or disposal any contaminated debris, water and soil generated by the event. Operations will not be resumed until the facility and emergency equipment are returned to full capability of their intended use.

Additional Information:

Under no circumstances should employees attempt to fight fires without summoning the fire department first. Employees should never jeopardize their lives or safety in attempts to control or fight fires.

Spills:

If a major spill should occur outside of the spill containment areas or exceed the capacity of the containment structure, the Emergency Coordinator will initiate a response to control, contain and recover the spilled substance. The Emergency Coordinator must evaluate if the facility's employees are capable of making an effective response, and have adequate personal protection. Initial response efforts for releases or spills from tank storage areas include:

- Removing, isolating, extinguishing or turning off all possible ignition sources;
- Shut down of facility operations in an orderly fashion and monitoring for dangerous conditions such as build-up of pressure, ruptures, leaks, etc.
- Locating the source of the spill;
- Shutting off, capping, plugging or patching the source of the spill, or transferring the material into a secure storage unit, if it can be done so safely;
- Placing containment boom or other material around the spilled material and its source;
- Removal of materials in the immediate vicinity of the affected area as necessary to minimize aggravation of the incident;
- Recovery of the spilled substance using pumps, vacuum equipment, absorbent;
- Placing the material in an appropriate secure container, tank or barge within an (unaffected) storage area in accordance with appropriate storage procedures.

If the spill is too large for the facility employees to handle expeditiously, or the spill event has resulted in the discharge of oil into the Canal, the Emergency Coordinator shall be prepared to contact an emergency response contractor or other services which may assist in the containment, recovery and clean-up of the spilled material. The Emergency Coordinator shall also contact the appropriate environmental regulatory agencies and coordinated emergency services.

Should a spill occur outside of a containment area, the Emergency Coordinator must take actions immediately to prevent migration of the substance or into navigable waterways.

vii.) Criteria for Facility Evacuation

The decision to evacuate the facility or locality falls to the Emergency Coordinator, given the specifics of the incident. Non-essential personnel may be evacuated at

the discretion of the Emergency Coordinator --and will be instructed where to assemble by the Evacuation Officer.

Evacuation Procedures

Responsibilities:

a. The Emergency Coordinator is responsible for implementing the evacuation procedure.

b. Each Supervisor is responsible for directing employees and visitors in his/her section to the proper exit and their assigned safe area.

c. The Evacuation Officer (designated by the Emergency Coordinator) is responsible for designating evacuation routes, rendezvous points and accounting for all evacuated employees and visitors.

Procedure:

a. The Emergency Coordinator will notify supervisors if an evacuation may be necessary.

b. The Emergency Coordinator will assess the conditions and order an evacuation or other actions required. The evacuation signal will be given by verbal notification and/or alarm signal (continuous short blasts over the PA).

c. When an evacuation is announced, stop work. Supervisors will direct employees in their areas to the closest available exit. All exits within any buildings are clearly marked with lighted or distinguishable signs.

d. All employees must leave the facility and report to the designated assembly area which will typically consist of the office area and/or parking lot or access road into the facility. Do not run. Do not linger in entrance ways or driveways; stay together in your assigned safe area.

e. Each employee must report to the Evacuation Officer at the assigned safe area.

f. The Evacuation Officer will specify a safe route of evacuation and a rendezvous point for employees to meet for a final accounting and further instructions.

g. The Evacuation Officer must report to the Emergency Coordinator when his/her employees have cleared the facility.

h. The Emergency Coordinator will notify the Evacuation Officer when

it is safe to re-enter the facility.

i. Stay outside the facility until notified by the Evacuation Officer when it is safe to re-enter.

Emergency Precautions:

a. Keep calm, think, avoid panic and confusion.

b. Know all exit locations. Be sure you know the safest and quickest way out of all buildings.

c. Do not lock office doors when vacating the facility. The Emergency Coordinator and emergency support personnel must have visual access to all areas to ensure that the facility is clear of personnel.

d. Do not delay evacuation of the facility for any reason.

e. Do not assist in fire control unless properly trained, qualified and requested to do so by the Emergency Coordinator.

f. When evacuating the facility, WALK to the nearest safe exit. Report to the personnel assembly area as directed and wait for instructions.

h. Keep out of the way, stay clear of the facility, and DO NOT interfere with the emergency operations.

Evacuation Routes/Plans:

In the event of an emergency, employees may be instructed to evacuate the plant.

Notification of evacuation will be given either by voice instruction or by an alarm signal (continuous short blasts over the PA).

Employees will proceed to the parking or office reception area, or another area indicated by the Emergency Coordinator where all employees will be accounted for by a ranking employee. A person shall be appointed by the Emergency Coordinator to act as the Evacuation Officer. The Evacuation Officer will instruct you to leave the site and specify a route of evacuation. You will be instructed to proceed to a rendezvous point where the Evacuation Officer will confirm everyone has been safely evacuated.

Upon giving the employees their evacuation instructions, the Evacuation Officer shall observe the employees' evacuation, and report to the Emergency Coordinator when all employees have left. The Evacuation Officer shall then leave the site, and proceed to the rendezvous point, checking along the way for stragglers or employees with disabled vehicles. At the rendezvous point, the Evacuation officer will confirm that all employees have safely arrived. If any employees are missing, the Evacuation Officer should report their absence immediately to the Emergency Coordinator, and local authorities. The Evacuation officer will then instruct you if you should proceed home or await further instructions.

viii.) Post-Emergency Response Procedures

Upon conclusion of the incident, the Emergency Coordinator will be responsible for the following event's conclusive efforts:

- direct and provide for the clean-up, characterization, treatment, storage or disposal of cleanup residues, or contaminated soil or water, or other materials involved in the incident.

- All emergency equipment is decontaminated, properly disposed of, resupplied, or fit for its intended use before operations resume.

- Maintain complete details of the incident, including an activity log, records of treatment, storage or disposal, medical or accident reports, and other information describing the incident, response and resolution.

ix). Emergency Equipment

Attachment 3 provides an inventory and description (Incl. Map) of the location of equipment available on-site to respond to fires, spills or releases of materials.

Heavy equipment and vehicles available for emergency response are maintained and inspected on a schedule established by the maintenance personnel.

Pumps, compressors, blowers, etc. are inspected and maintained as use dictates.

x.). Amendment of Contingency Plan

The Contingency Plan will be reviewed, and immediately amended, if necessary, whenever:

- The plan fails in an emergency;

- The facility changes -- in its design, construction, operation, maintenance or other circumstances -- in a way that materially increases the potential for fires, explosions or releases, or changes the response necessary in an emergency;

- The list of emergency coordinators changes;

2. A written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

Enclosed under Attachment 6 referenced above is a signed written commitment of manpower, equipment and materials to effectively respond to a major discharge of oil.

E. Additional Spill Prevention and Containment Procedures.

1. Facility drainage;

A topographic survey of the plant operations was completed. The primary drainage pathways are to the center of the facility to an approximate 1.5' - 2 feet depressed area located with the bedrock. The southern section of the facility adjacent to the Canal is relatively flat.

2. Bulk storage tanks;

Service Welding has the following storage tanks presently in use:

Total # of tanks	Tank Identification Number	Approximate Dimensions/Volume	Product Stored
7	40-1 Thru 40-7	13'x40'/40,000 Gal.	Veg. oil product/Soapstock (Temp. Storage until market is achieved)
4	B-1, B-2, U-9, U-10	9'x20'/15,000 Gal.	Boiler Fuel – Primary Storage
16	U-3 through U-18	10'x32'/24,000 Gal.	Boiler Fuel - Temporary, Emergency Backup Storage
4	U-19 through U-22	10'x 32'/24,000 Gal.	Boiler Fuel - Temporary, Emergency Backup Storage
	*NOTE: One of these tanks will be properly decomissioned on a temporary basis, i.e., moved out of the containment system, until adequate containment can be added to accomodate the appropriate storage.		
1	#8	4'x15'/1500 Gal.	Diesel Fuel tank for road vehicles
1	#9	4'5'/500 Gal.	Gasoline tank for yard vehicles
1	#10	4'x8'/800 Gal.	Diesel Fuel for yard vehicles

The seven soapstock storage tanks are to be in use temporarily. Service Welding and Ship Building will be emptying these tanks of their product as soon as a buyer can be procured.

i. Tank materials of construction and conditions of storage such as pressure and temperature, etc.

All tanks presently in use are of mild steel construction which is compatible with the product that is being stored, i.e., vegetable oil product (soapstock) and petroleum products. All products are stored at ambient pressure and ambient temperature.

ii. Secondary means of containment (entire contents of the largest single tank plus sufficient freeboard to allow for precipitation).

Refer to Item C.1. Additionally, secondary containment areas will be inspected on a daily basis for precipitation accumulation. Any precipitation

accumulation will be inspected daily and removed to ensure sufficient capacity remains.

iii. Drainage of rainwater from the diked area into a storm drain or an effluent discharge.

a. By-pass System

There are no storm drains from the ASTs' containment systems located on-site. Currently, Service Welding is managing the stormwater accumulation within containment areas by means of discharge under a NPDES permit issued by the Illinois EPA, Division of Water Pollution Control (Permit # ILR 005304).

b. Inspection of the run-off rainwater.

Currently, precipitation is collected within the containment structure. Prior to discharge, Service Welding inspects the stormwater accumulated within the containment areas itself for evidence of free-phase product. All free-phase product will be removed via pumps or absorbent pads/booms prior to discharge of the stormwater to the Canal. Testing of the stormwater discharge has revealed the lack of applicable constituents, i.e., oil and grease, pH and selected petroleum constituents above the effluent discharge standards of 35 IAC Subtitle C (Part 304).

Additionally, formal inspection procedures have been developed to address the immediate response to small deminimus spills and to maintain good "housekeeping" operations. A copy of the inspection procedures and forms are incorporated under Attachment 7.

c. By-Pass Valve Operation

Not Applicable.

d. Adequate records are kept of events.

The stormwater is managed under an NPDES Stormwater permit. Service Welding empties the secondary containment system during or after each rainfall. Records of rainfall events are maintained by the Illinois State Climatologist Office. This information can be viewed on www.sws.uiuc.edu/atmos/statecli.

iv. Buried metallic storage tanks

There are no underground storage tanks present at the facility.

v. Partially Buried Metallic Storage Tanks

There are no partially buried storage tanks present at the facility.

vi. Periodic Integrity Testing

On an annual basis, the tanks remaining in permanent use will be emptied and the interiors visually inspected for signs of degradation. Additionally, every five years the tanks will be subject to ultra-sonic testing. The results of these tests will be maintained on record for three years.

vii. Internal heating coils

Only Tanks B-1 and B-2 are equipped with internal heating coils. The steam is vented from these tanks to the atmosphere. As part of the daily inspection of the plant, the steam effluent will be inspected to ensure there is no product in the discharge steam line.

viii. Aboveground tank spill control overflow equipment.

Due to the small number of tanks (boiler fuel) to remain in primary operation (with the remaining only acting as emergency back-up storage) and due to the small number of transfers that take place from the barge to the tanks, in lieu of automatic tank gaging devices, all tank filling operations are continuously monitored by two men (either equipped with two-way radios; or trained on hand signals for shut-off). One man will be responsible for the transfer pumping operation and the other man will be gauging the tank. In the event filling operations indicate levels within a few feet of the overspill manway for the tank, either communication by radio or hand signal will be made to the pump operator to shut the pump down. This will ensure that the entire loading/unloading operation will be adequately monitored to prevent the potential for overfilling. With regard to the smaller (gasoline & diesel) fueling tanks, the supplier is required to gauge the tank prior to filling, and then add that appropriate amount to avoid overfilling. Additionally, because of the close proximity of the tank to the designated unloading area, the driver can additionally visually inspect the tanks during loading from the vacuum pump on his tanker and ensure no spills or overfills occur.

ix. Plant effluent inspection.

The only effluent that is discharge form the facility is the stormwater that accumulates within the AST containment structures. These are visually inspected for free phase oil prior to discharge to the canal.

x. Visible oil leaks inspection.

All tanks and associated containment areas are inspected during the daily operations of the facility. Due to the limited number of tanks that are in active operation, only one person is dedicated to inspect the tanks and plant on a daily basis/weekly basis. Any visible oil leaks will be immediately removed. Attachment 7 provides procedures to be followed during an inspection.

xi. Mobile or portable oil storage tanks.

None.

3. Facility transfer operations, pumping, and in-plant process (onshore);

There are currently only 11 tanks that are in primary active use at this time at the plant. The 7 - 40,000 gallon tanks are full at this time and are intended to be emptied at such time a buyer can be obtained for this product. There are no transfers occurring from these tanks. They are presently serving as bulk storage units. The primary remaining active tanks at this location are the four (4) 15,000 gal. boiler fuel tanks. These tanks are used to store boiler fuel that is stripped from the fuel barges that are maintenanced by Service Welding. The additional sixteen (16) 24,000 gal. upright tanks will be used for emergency backup storage in which storage time will be limited. Barge to tank transfers (of boiler fuel only) are done so by means of an on-site vacuum tanker and flex hosing and are additionally subject to the provisions of EMC's Coast Guard Emergency Response Plan. Tank to tank transfers are completed using portable pumps and flex hosing. Portable "drip pans" are used to contain spillages from valve connections during tanker to tank and tank to tank transfer of materials. There is no product piping in operation at the plant. Additionally, there is no buried piping located on-site.

When the vehicle fuel tanks (gasoline and diesel ASTs) are fueled, the supplier additionally is required to utilized drip pans to contain any deminimus spills from valve connections during transfer operations.

4. Facility tank car and tank truck loading/unloading rack;

i. IDOT Requirements --

IDOT's requirements regarding Loading/Unloading (49 CFR 177, Subpart B) is specific to hazardous materials. Service Welding only manages boiler fuel through on-site transfers. Boiler fuel is not a hazardous material. The only materials accepted at the facility which would be subject to Subpart B would be the gasoline shipments provided by an off-site supplier. It is the responsibility of the supplier to comply with Subpart B. Service Welding has communicated this to the supplier and primarily has emphasized the following:

- No smoking during loading
- Handbrake to be set
- Attendance of vehicle during duration of unloading operation
- Assurance that all valves and hoses are closed and sealed following off-loading

Therefore, based upon the above, the facility is in compliance with the minimum requirements of DOT.

ii. Containment system

Fueling of the small vehicle fuel storage tanks is completed along side the west end of the containment area by a tanker truck with a maximum of 3000 gallon capacity. The containment system walls for these tanks and the adjacent building will act as diversion structures to contain any major spills or leaks from the unloading operations associated with the filling of the small gasoline and diesel fuel tanks, until such time response action can be implemented. The general topography from this area is sloped primarily toward the south and therefore and major spills or releases will be contained by the building and containment structure to the south and east.

Additionally, transfers of boiler fuel from barge to tanks is completed by means of a small (max. 3000 gal.) on-site vacuum tanker (which is thus subject to the provisions of EMC's Coast Guard Response Plan) When unloading from the vacuum tanker to one of the boiler fuel tanks, the vacuum tanker is parked along the west side of the "B" tanks' containment system . In the event of a major release from the vacuum tanker itself, the containment wall would act to prohibit the release from reaching the nearest entrance into the Canal and the topography dictates the flow of materials towards the "depressed" area, which has enough demonstrated capacity to contain the contents of the trucks capacity.

iii. Physical barrier system, (loading/unloading areas). -- During transfer operations all tankers will use chocks to prevent premature departure during loading and unloading.

iv. Tanker truck inspection -- During unloading all equipment, including the transport tanker, is continuously monitored to ensure there is no leakage from the vehicle's tanker or hose connections. Emphasis will be placed on inspection of the vehicle prior to loading and off-loading.

5. Inspections and records;

The ASTs are inspected on a daily basis and the entire plant is inspected weekly. Inspections are completed by one dedicated individual, Mr. Daniel Egan. In the event an incident, malfunction or deterioration is observed, the inspection will be recorded and the response action taken shall additionally be recorded. The results of periodic integrity testing of the tanks shall also be recorded.

All records of such inspections shall be maintained for three years from the date thereof.

6. Security

i. There are security personnel (under contract) on-site 24 hours a day to ensure access to the facility is prohibited except by authorized personnel. Additionally, there is an 8' cyclone fence (topped with barbed wire) surrounding the entire facility, with locking gate access for vehicles.

ii. The drain valves on each of the tanks are maintained in closed position when in non-operating status. These are inspected on a daily basis to ensure they are closed. Transfer operations personnel are additionally trained to ensure that the valves are tightly closed following each transfer. The plant is operational on a 24 hour basis.

iii. Only portable pumps are used for transfer operations.

iv. There are no active product pipelines in use at the facility. Only portable flexible hosing is used for transfer operations specific to the boiler fuel tanks. The soapstock storage tanks are only in temporary (bulk storage only) use and no transfer of these materials is taking place. The overhead piping associated with the former transfer operations of these materials has been taken out-of-use.

v. There are overhead lights located at each of the storage areas to provide adequate lighting during night time hours. Additionally, the plant is closed and gated during evening hours and is subject to 24 hour security surveillance.

7. Personnel, training and spill prevention procedures;

i. Personnel Training

Service Welding realizes that implementation of the SPCC Plan would not be possible without proper education and training of its employees involved with product management on how to respond to emergencies and excise precautions to prevent sudden or non-sudden releases. All plant personnel involved with AST storage or management operations are trained specific to the SPCC procedures.

The initial and continuing training program includes:

- Communication about all products used or stored on-site;
- Proper management of equipment during product storage and transfer operations
- Emergency notification procedures;
- Emergency response procedures;
- Evacuation procedures;
- Spill, fire and release preventative measures and controls.

Presently there are two persons involved with the day to day AST management operations:

Daniel Egan, Plant Manager

Andrew Chanda, USCG licensed tankerman.

Copies of the personnel training for these individuals is maintained on record at the facility.

ii Frequency of Training

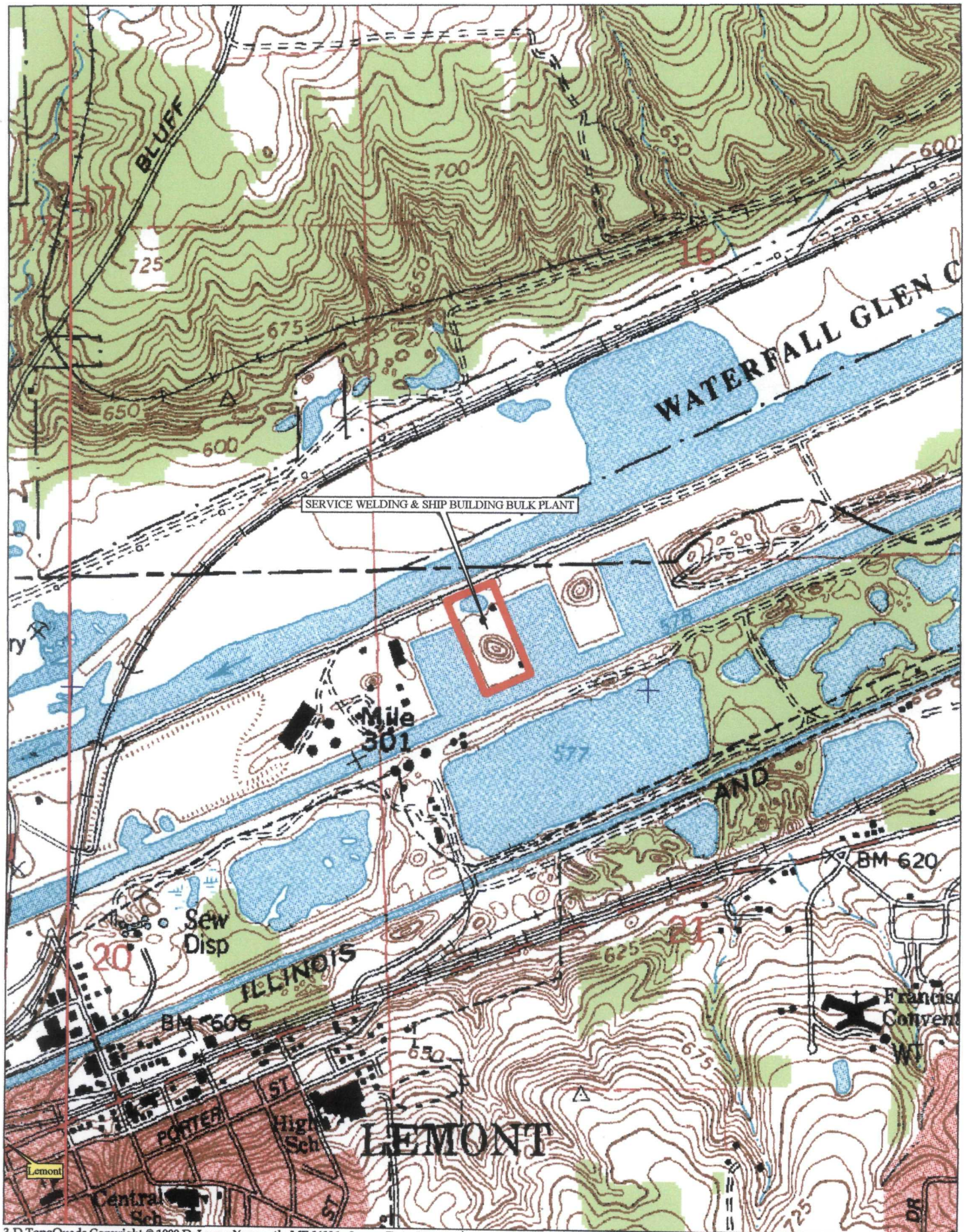
All operations personnel involved in the management of the AST systems on-site will be subject to SPCC briefings at such time there is a spill event or failure, malfunctioning components and any changes made to the SPCC plan herein.

Furthermore, the AST/SPCC Management Personnel are required to attend competent person seminars every five years in accordance with the United States Coast Guard requirements.

ATTACHMENT 1:

REGIONAL SITE TOPOGRAPHIC MAP
AND
TOPOGRAPHIC SITE PLAN MAP

SPCC PLAN (9/2001), ATTACHMENT 1: SITE TOPOGRAPHIC LOCATION MAP
SERVICE WELDING & SHIP BUILDING, NE CANAL BANK ROAD, LEMONT, ILLINOIS



 Source Data: USGS 450 ft Scale: 1 : 12,000 Detail: 14-1 Datum: WGS84

ATTACHMENT 2:

STORAGE PRODUCT MATERIAL SAFETY DATA SHEET(S)

Material Safety Data Sheet

U.S. Department of Labor
Occupational Safety and Health Administration

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Standard must be consulted for specific requirements.

IDENTITY (As Used on Label and List)
Soapstocks

Section I

Manufacturer's Name
Archer Daniels Midl

Address (Number, Street, City, State, and ZIP Code)
4666 Faries Parkway
Decatur, Illinois 625256

Emergency Telephone Number
217-424-5465

Telephone Number for Information
As above

Date Prepared
May 26, 1988

Signature of Preparer (optional)

If any item is not applicable, or no information is available, the space must be marked to indicate that.

Section II — Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity; Common Name(s))	OSHA PEL	ACGIH TLV	Other Limits Recommended	% (optional)

Section III — Physical/Chemical Characteristics

Boiling Point	212°F	Specific Gravity (H_2O = 1)	(0.9236 - 1.000)
Vapor Pressure (mm Hg.)	Liquid	Melting Point	
Vapor Density (AIR = 1)	Liquid	Evaporation Rate (Butyl Acetate = 1)	

Solubility in Water
Yes

Appearance and Odor
Thick or thin liquid yellowish - rancid

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used)	Flammable Limits	LEL	UEL
540°F (CC)			

Extinguishing Media
Water spray, dry chemical, foam or carbon dioxide

Special Fire Fighting Procedures

Unusual Fire and Explosion Hazards

(Reproduce locally)

OSHA 174, Sept. 198

Section V — Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable	X	Extended heating

Incompatibility (Materials to Avoid): Oxidizing agents

Hazardous Decomposition or Byproducts:

Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	

Section VI — Health Hazard Data

Route(s) of Entry: Inhalation? Skin? Ingestion?

Health Hazards (Acute and Chronic):

Carcinogenicity: NTP? IARC Monographs? OSHA Regulated?

Signs and Symptoms of Exposure:

Medical Conditions Generally Aggravated by Exposure:

Emergency and First Aid Procedures:

Section VII — Precautions for Safe Handling and Use

Steps to Be Taken in Case Material Is Released or Spilled:
Contains spills and pick-up.
Clean with absorbent media or wash with hot water

Waste Disposal Method:
In appropriate land fill for non toxic wastes follow federal, state or local regulations.

Precautions to Be Taken in Handling and Storing:
Avoid excessive heat in storage to maintain product quality.

Other Precautions:

Section VIII — Control Measures

Respiratory Protection (Specify Type): None

Ventilation	Local Exhaust: Not required	Special
	Mechanical (General)	Other

Protective Gloves: None

Eye Protection: Safety glasses

Other Protective Clothing or Equipment:

Work/Hygienic Practices:

MATERIAL SAFETY DATA SHEET

MANUFACTURER/SUPPLIER:
Service Welding and Shipbuilding
P.O. Box 660
Lemont, Illinois 60439

EMERGENCY TELEPHONE NUMBER (708) 739-6660

Chemical Name: ACIDULATED SOYBEAN OIL
Trade Name: ACID OIL

Hazardous Ingredients: None
Hazardous Mixtures of Other Liquids, Solids, or Gases: By-product of vegetable oil processing, not hazardous.

PHYSICAL DATA

Boiling Point (F°): >400° F
Vapor Pressure (mm Hg) @ 20° C: 1
Vapor Density (air=1): >1
Specific Gravity (H2O): 0.95
Percent Volatile by Volume @ 100° C: <2.0
Evaporation Rate: NA
Solubility in Water: Very Soluble
Appearance and Odor: Dark brown liquid or semi-liquid with a strong odor.

FIRE AND EXPLOSION HAZARD DATA

Flash Point: >350° F
Extinguishing Media: CO2 foam or dry chemical
Special Fire Fighting Procedures: Use self-contained breathing apparatus
Unusual Fire and Explosion Hazards: A flammable vapor-air mixture may form if the porduct is heated above the flash point.

HEALTH HAZARD INFORMATION

Threshold Limit Value: No known health hazards.
Effects of Overexposure: None under normal handling conditions.
Emergency and First Aid Procedures:
Contact Areas: Wash with soap and water.
Ingestion: Induce vomiting and call a physician
Inhalation: Apply artificial respiration if needed. Call a physician.

REACTIVITY DATA

Stability: Stable
Incompatability: Compressed oxygen and other oxidizing agents.
Hazardous Decomposition Products: Fumes may be toxic if product is heated to decomposition.
Hazardous Polymerization: Will not occur.

SPILL OR LEAK PROCEDURES

Steps to be Taken in Case Material is Released or Spilled:
Pump or scoop into containers. Use absorbent or flush with detergent and hot water.
Waste Disposal Method:
Use an approved land-fill or incinerate. Ensure compliance with local, state or Federal regulations.

SPECIAL PROTECTION INFORMATION

Ventilation: Mechanical.
Protective Gloves: Rubber.
Eye Protection: Splash-proof goggles.
Other Protective Equipment: Coveralls.

SPECIAL PRECAUTIONS

Precautions to be Taken in Handling and Storing: Use normal handling conditions. Store in tanks away from heat sources that exceed the flash point.

KOCH

MATERIAL SAFETY DATA SHEET

CHEMICAL PRODUCT & COMPANY IDENTIFICATION

TRADE NAME	**REFORMULATED GASOLINE**
CAS NUMBER	MIXTURE
MSDS NUMBER	5467
PRODUCT CODE	ND
SYNONYM(S)	MOTOR FUEL UNLEADED GASOLINE APPLICABLE TO ALL GRADES
MANUFACTURER	Koch Petroleum Group, LP. PO Box 2608 Corpus Christi, TX 78403

TELEPHONE NUMBERS - 24 HOUR EMERGENCY ASSISTANCE

Koch Petroleum Group, LP.:	361-241-4811
CHEMTREC:	800-424-9300

TELEPHONE NUMBERS - GENERAL ASSISTANCE

8-5 (M-F, CST)	361-241-4811
8-5 (M-F, CST) MSDS Assistance	316-828-6468

2 COMPOSITION / INFORMATION ON INGREDIENTS

Ingredient Name	CAS Number	Concentration*	Exposure Limits / Health Hazards
GASOLINE, UNLEADED	MIXTURE	82 - 100 %	Gasoline: 300 ppm 8-Hour TWA (ACGIH) 500 ppm 15-Min STEL (ACGIH)
TOLUENE	108-88-3	0 - 20 %	200 ppm 8-Hour TWA (OSHA) 300 ppm CEILING (OSHA) 50 ppm 8-Hour TWA (ACGIH)
XYLENES	1330-20-7	0 - 18 %	100 ppm 8-Hour TWA (OSHA) 100 ppm 8-Hour TWA (ACGIH) 150 ppm 15-Min STEL (ACGIH)
ETHYL-T-BUTYL ETHER	637-92-3	0 - 18 %	5 ppm 8-Hour TWA (ACGIH)
TERT-AMYL METHYL ETHER	994-05-8	0 - 18 %	ND
METHYL-T-BUTYL ETHER	1634-04-4	0 - 15 %	40 ppm 8-Hour TWA (ACGIH)
ETHYL ALCOHOL	64-17-5	0 - 10 %	1000 ppm 8-Hour TWA (OSHA) 1000 ppm 8-Hour TWA (ACGIH)
N-HEXANE	110-54-3	0 - 7 %	500 ppm 8-Hour TWA (OSHA) 50 ppm 8-Hour TWA (ACGIH)
T-BUTYL ALCOHOL	75-65-0	0 - 7 %	100 ppm 8-Hour TWA (OSHA) 100 ppm 8-Hour TWA (ACGIH)

Ingredient Name	CAS Number	Concentration*	Exposure Limits / Health Hazards
ETHYLBENZENE	100-41-4	0 - 4 %	100 ppm 8-Hour TWA (OSHA) 100 ppm 8-Hour TWA (ACGIH) 125 ppm 15-Min STEL (ACGIH)
CYCLOHEXANE	110-82-7	0 - 3 %	300 ppm 8-Hour TWA (OSHA) 300 ppm 8-Hour TWA (ACGIH)
METHYL ALCOHOL	67-56-1	0 - 3 %	200 ppm 8-Hour TWA (OSHA) 200 ppm 8-Hour TWA (ACGIH) 250 ppm 15-Min STEL (ACGIH)
1,2,4-TRIMETHYLBENZENE	95-63-6	0 - 2 %	25 ppm 8-Hour TWA (ACGIH)
BENZENE	71-43-2	0 - 1.3 %	1 ppm 8-Hour TWA (OSHA) 5 ppm 15-Min STEL (OSHA) 0.5 ppm 8-Hour TWA (ACGIH) 2.5 ppm 15-Min STEL (ACGIH)
NAPHTHALENE	91-20-3	0 - 1 %	10 ppm 8-Hour TWA (OSHA) 10 ppm 8-Hour TWA (ACGIH) 15 ppm 15-Min STEL (ACGIH)
CUMENE	98-82-8	0 - 1 %	50 ppm 8-Hour TWA (OSHA) 50 ppm 8-Hour TWA (ACGIH)

*Values do not reflect absolute minimums and maximums; these values are typical which may vary from time to time.

This Material Safety Data Sheet is intended to communicate potential health hazards and potential physical hazards associated with the product(s) covered by this sheet, and is not intended to communicate product specification information. For product specification information, contact your Koch Petroleum Group, LP. representative.

3 HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

WARNING!

HEALTH HAZARDS
MAY CAUSE CARDIAC SENSITIZATION
MAY BE HARMFUL OR FATAL IF SWALLOWED OR INHALED
MAY BE IRRITATING TO THE SKIN, EYES AND RESPIRATORY TRACT
ASPIRATION HAZARD IF SWALLOWED-CAN ENTER LUNGS AND CAUSE DAMAGE
OVEREXPOSURE MAY CAUSE CNS DEPRESSION
POTENTIAL REPRODUCTIVE HAZARD
POTENTIAL CANCER HAZARD
DANGER-CONTAINS BENZENE-CANCER HAZARD
SEE "TOXICOLOGICAL INFORMATION" (SECTION 11) FOR MORE INFORMATION

FLAMMABILITY HAZARDS
EXTREMELY FLAMMABLE
FORMS EXPLOSIVE MIXTURES WITH AIR
MAY CAUSE FLASH FIRE

REACTIVITY HAZARDS
STABLE

POTENTIAL HEALTH EFFECTS, SKIN
IRRITATING. Contact may cause reddening, itching and inflammation. Repeated or prolonged contact may result in drying, reddening, itching, pain, inflammation, cracking and possible secondary infection with tissue damage. Defatting agent.

Absorption from prolonged or repeated skin contact may cause systemic toxicity.
POTENTIAL HEALTH EFFECTS, EYE
Direct contact may cause irritation, redness, tearing and blurred vision.

Exposure to vapors, fumes or mists may cause irritation. Direct contact may cause pain, tears, burns, sensitivity to light, swelling and possible corneal damage.
POTENTIAL HEALTH EFFECTS, INHALATION
Breathing of the mists, vapors or fumes may irritate the nose, throat and lungs. Symptoms may include sore throat, coughing, labored breathing, sneezing and burning sensation, depending on the concentration and duration of exposure.

Exposure to high concentrations of mists may lead to oil chemical pneumonia.

May cause central nervous system depression or effects. Symptoms may include headache, excitation, euphoria, dizziness, incoordination, drowsiness, light-headedness, blurred vision, fatigue, tremors, convulsions, loss of consciousness, coma, respiratory arrest and death, depending on the concentration and duration of exposure. Repeated or prolonged exposures may cause behavioral changes.

May cause cardiac sensitization, including arrhythmia (irregular heart beat) and death due to cardiac arrest.

Overexposure to this material may cause systemic damage including target organ effects listed under "Toxicological Information" (Section 11).

Other specific symptoms of exposure are listed under "Toxicological Information" (Section 11).
POTENTIAL HEALTH EFFECTS, INGESTION
May cause irritation of the mouth, throat and gastrointestinal tract. Symptoms may include salivation, pain, nausea, vomiting and diarrhea.

Aspiration into lungs may cause chemical pneumonia and lung damage.

Exposure may also cause central nervous system symptoms similar to those listed under "Inhalation" (see Inhalation section).

Overexposure to this material may cause systemic damage including target organ effects listed under "Toxicological Information" (Section 11).

Other specific symptoms of exposure are listed under "Toxicological Information" (Section 11).

4 FIRST AID MEASURES

SKIN

Immediately wash skin with plenty of soap and water while removing contaminated clothing and shoes. Get medical attention if irritation develops or persists.

Place contaminated clothing in closed container for storage until laundered or discarded. If clothing is to be laundered, inform person performing operation of contaminant's hazardous properties. Discard contaminated leather goods.
EYE
Flush immediately with large amounts of water for at least 15 minutes. Eyelids should be held away from the eyeball to ensure thorough rinsing. Get medical attention if irritation persists.
INHALATION
Remove to fresh air. If not breathing, institute rescue breathing. If breathing is difficult, ensure airway is clear and give oxygen.

Keep affected person warm and at rest. GET IMMEDIATE MEDICAL ATTENTION.

INGESTION
Do not induce vomiting because of danger of aspirating liquid into lungs, causing serious damage and chemical pneumonitis. If spontaneous vomiting occurs keep head below hips to prevent aspiration and monitor for breathing difficulty. Gastric lavage should be performed only by qualified medical personnel.

Keep affected person warm and at rest. GET IMMEDIATE MEDICAL ATTENTION.

NOTES TO PHYSICIAN
Aspiration of low viscosity petroleum hydrocarbons may cause severe pneumonitis (oil pneumonia). Vomiting should not be induced. In unconscious victims, use of an endotracheal tube should be considered, if gastric lavage is undertaken. If spontaneous vomiting has occurred after ingestion, the patient should be monitored for difficult breathing, as adverse effects of aspiration into the lungs may be delayed up to 48 hours.

In cases of acute poisoning, artificial respiration with administration of oxygen may be useful for support. DO NOT GIVE EPINEPHRINE, EPHEDRINE OR SIMILAR ADRENERGIC DRUGS. THEY MAY INDUCE FATAL VENTRICULAR FIBRILLATION. Electrocardiographic monitoring should be carried out with severely ill patients to anticipate possible cardiac arrest.

Anemia may require the usual supportive measures. Medical evaluation of acute overexposure should include hematological determinations until stable. In severe acute and chronic poisoning, both renal and hepatic damage may occur and should be anticipated in such cases. Respiratory and pulmonary problems may require special attention. After severe acute symptoms have been alleviated, it may be advisable to consider periodic monitoring of the patient until such time as the likelihood of other adverse effects can be discounted.

INHALATION ABUSE: Gasoline is one of the solvents used by chemical substance abusers. These patients may present acute or chronic CNS signs or symptoms as well as arrhythmias.

FIRE FIGHTING MEASURES

HAZARDOUS COMBUSTION PRODUCTS
Combustion may produce COx, NOx and SOx.
EXTINGUISHING MEDIA
Use water spray, dry chemical, alcohol foam, all purpose AFFF or carbon dioxide to extinguish fire.
BASIC FIRE FIGHTING PROCEDURES
Shut off source of flow if possible.

Evacuate area and fight fire from a safe distance.

If leak or spill has not ignited, ventilate area and use water spray to disperse gas or vapor and to protect personnel attempting to stop a leak. Use water spray to cool adjacent structures and to protect personnel.

Containers can build up pressure if exposed to heat (fire). Stay away from storage tank ends. Withdraw immediately in case of rising sound from venting safety device or any discoloration of storage tank due to fire.

Be aware that a BLEVE (Boiling Liquid Expanding Vapor Explosion) may occur unless surfaces are kept cool with water.

Firefighters must wear MSHA/NIOSH approved positive pressure breathing apparatus (SCBA) with full face mask and full protective equipment.
UNUSUAL FIRE & EXPLOSION HAZARDS
Extremely flammable. Vapors form flammable or explosive mixtures with air at room temperature. Vapor or gas may spread to distant ignition sources and flash back.

Explosion hazard if exposed to extreme heat or to physical or thermal shock.

Flash Point	-40 °F (-40 °C) TAG CLOSED CUP
Autoignition Temperature	536 - 853 °F (280 - 456 °C)
Flammability Limits in Air, Lower, % by Volume	1.4 %
Flammability Limits in Air, Upper, % by Volume	7.6 %

ACCIDENTAL RELEASE MEASURES

EMERGENCY ACTION

Eliminate and/or shut off ignition sources and keep ignition sources out of the area. Keep unnecessary people away; isolate hazard area and deny entry. Stay upwind. Isolate for 1/2 mile in all directions if tank, rail car or tank truck is involved in fire. Evacuate area endangered by release as required. (See Exposure Control/Personal Protection - Section 8).

ENVIRONMENTAL PRECAUTIONS

Eliminate all sources of ignition. Isolate hazard area and deny entry.

If product is released to the environment, take immediate steps to stop and contain release. Caution should be exercised regarding personnel safety and exposure to the released product. Notify local authorities and the National Response Center, if required.

SPILL OR LEAK PROCEDURE

Keep unnecessary people away. Isolate area for at least 25-50 meters (80-160 feet) to preserve public safety. For large spills, consider initial evacuation for at least 300 meters (1000 feet).

Keep ignition sources out of area and shut off all ignition sources. Absorb spill with inert material (e. g. dry sand or earth) then place in a chemical waste container. Large Spills: Dike far ahead of liquid spill for later disposal.

Use vapor suppressing foam to reduce vapors. Stop leak when safe to do so.

See Exposure Controls/Personal Protection (Section 8).

7 HANDLING & STORAGE

HANDLING

Ground lines and equipment used during transfer to reduce the possibility of static spark-initiated fire or explosion. Use non-sparking tools. Do not cut, grind, drill, weld or reuse containers unless adequate precautions are taken against these hazards.

Do not eat, drink or smoke in areas of use or storage.

STORAGE

Store in tightly closed containers in a cool, dry, isolated, well-ventilated area away from heat, sources of ignition and incompatibles. Avoid contact with strong oxidizers.

Empty containers may contain product residue. Do not reuse without adequate precautions.

8 EXPOSURE CONTROLS / PERSONAL PROTECTION

ENGINEERING CONTROLS

Ventilation and other forms of engineering controls are the preferred means for controlling exposures.

EYE PROTECTION: PERSONAL PROTECTION EQUIPMENT (PPE)

Wear chemical safety goggles and face shield. Have eye washing facilities readily available where eye contact can occur.

SKIN PROTECTION: PERSONAL PROTECTION EQUIPMENT (PPE)

Avoid skin contact with this material. Use appropriate chemical protective gloves when handling.

Use good personal hygiene.

RESPIRATORY PROTECTION: PERSONAL PROTECTION EQUIPMENT (PPE)

A NIOSH/MSHA approved air purifying respirator with an appropriate cartridge or canister may be appropriate under certain circumstances where airborne concentrations are expected to exceed exposure limits. Protection provided by air purifying respirators is limited. Use a positive pressure air supplied respirator if there is any potential for an uncontrolled release, exposure levels are not known, or any other circumstances where air purifying respirators may not provide adequate protection.

9 PHYSICAL & CHEMICAL PROPERTIES

ODOR AND APPEARANCE

CLEAR, COLORLESS LIQUID WITH A SHARP, PENETRATING, AROMATIC ODOR

Boiling Point	80 - 90 °F (27 - 32 °C)
Specific Gravity	ND
Melting Point	-130 °F (-90 °C)
Percent Volatile	100 %
Vapor Pressure	6.4 - 15 psia @ 100 °F (38 °C)
Vapor Density	3 - 4
Bulk Density	ND
Solubility in Water	NEGLIGIBLE
Octanol/Water Partn	ND
Volatile Organic	ND
Pour Point	ND
pH Value	ESSENTIALLY NEUTRAL
Freezing Point	ND
Viscosity	ND
Evaporation Rate	MODERATELY FAST
Molecular Formula	MIXTURE
Molecular Weight	NA
Chemical Family	HYDROCARBON MIXTURE
Odor Threshold	ND

10 STABILITY & REACTIVITY

STABILITY/INCOMPATABILITY

Incompatible with oxidizing agents. See precautions under Handling & Storage (Section 7).

HAZARDOUS REACTIONS/DECOMPOSITION PRODUCTS

Combustion may produce COx, NOx and SOx.

11 TOXICOLOGICAL INFORMATION

ROUTES OF EXPOSURE

Inhalation, ingestion, skin and eye contact.

TOXICOLOGICAL DATA

Acute or chronic overexposure to this material or its components may cause systemic toxicity, including adverse effects to the following: kidney, liver, spleen, pancreas, thymus, blood, adrenals, pituitary and thyroid. Other systems or target organs include the following: immune, respiratory, cardiovascular and nervous systems.

Exposure to components of this material may cause the following specific symptoms, depending on the concentration and duration of exposure: anemia.

This material may contain benzene. Benzene is carcinogenic to laboratory animals when given by intubation or by inhalation. There is an association between occupational exposure to benzene and human leukemia. Carcinogenic determinations: IARC Human positive and Animal suspected carcinogen; NTP Known carcinogen; ACGIH Suspected carcinogen; OSHA carcinogen. Acute benzene poisoning causes central nervous system depression. Chronic exposure affects the hematopoietic system causing blood disorders including anemia and pancytopenia. Mutagenic and clastogenic in mammalian and non-mammalian test systems. Reproductive or developmental toxicant only at doses that are maternally toxic, based on tests with animals.

This material may contain toluene. Toluene is an eye, skin, and respiratory tract irritant as well as a central nervous system depressant. Overexposure may result in damage to the brain, liver, kidney, cardiovascular, respiratory and neurological systems. Prolonged and repeated exposure may result in behavioral effects, anemia, and color vision abnormalities, blindness and hearing loss. It has been shown to produce reproductive effects in both humans and laboratory animals. It has also been reported to produce cardiac sensitization. Repeated or prolonged exposure to toluene may result in skin absorption, which may result in toxic effects. IARC has determined that there is inadequate evidence for the carcinogenicity of toluene in humans and experimental animals (IARC Class 3).

This material may contain ethanol. Repeated ingestion of ethanol can result in alcohol abuse, causing behavioral changes, memory loss, impaired judgement, decreased appetite, irregular heartbeats, and decreased fertility. Prolonged and repeated ingestion of ethanol has also been associated with cancers of the mouth, pharynx, esophagus and liver. Ethanol ingestion by pregnant women can cause miscarriage, low birth weight, premature birth and fetal alcohol syndrome. In males, acute and chronic alcohol ingestion may affect gonadal hormone levels. It may also affect the liver, kidney, brain, blood and cardiovascular system.

This product contains n-hexane. n-Hexane is a skin, eye and respiratory tract irritant. It is a cardiac sensitizer, central nervous system depressant and a neurotoxin. Acute exposure may result in dizziness, asphyxia, anesthesia, brain damage and cardiac arrest at high concentrations. Repeated or prolonged exposure may result in peripheral neuropathy, characterized by progressive weakness, facial and limb numbness, color vision abnormalities and paralysis of the limbs. It has been observed to cause damage to the testes and fetal effects in a two generation animal study. NTP has reported it to cause liver tumors in female mice. Persons with skin, lung, liver or kidney disorders may be at increased risk.

This material may contain tert-butyl alcohol. Chronic exposure to tert-butyl alcohol (TBA) by the oral route produced some evidence of cancer in male rats, and female mice, equivocal evidence in male mice and no evidence in female rats. Overexposure may also effect the central nervous system, heart, liver, kidney and urinary bladder. Exposure by both the inhalation and oral routes to experimental animals has produced some evidence of reproductive and fetal effects (in some cases with maternal toxicity).

This material may contain methyl alcohol. Methyl alcohol is a skin and eye irritant. It is slightly toxic by inhalation, skin absorption and ingestion. It has been shown to produce neurotoxicity and is a central nervous system depressant. Poisoning may affect the eyes, kidneys, heart, brain and liver. Intoxication may result in inebriation. Symptoms may occur within 12-18 hours after exposure and may include: headache, dizziness, nausea, vomiting, diarrhea, ringing in ears, dullness, restlessness, diminished appetite, weakness, abnormal rapid heart beat and leg cramps. Blurred or dimmed vision with optic neuritis, rhythmical movement of eyeball, dilated, unresponsive pupils, eye pain, concentric constriction of visual fields, intolerance to light and optic nerve atrophy, with transient or permanent blindness. Effects on vision may be delayed. It has been shown to produce reproductive/fetal effects in laboratory animals.

This material may contain naphthalene. Naphthalene can be harmful by any route of exposure. Humans may be more sensitive to naphthalene than laboratory animals. Naphthalene can cause skin and eye irritation and acute central nervous system effects. It can also cause blood effects, including hemolytic and aplastic anemia, cataracts, liver and kidney damage. Following maternal exposure, naphthalene has also been reported to cause fetal blood system, liver and possibly eye damage. In a 2-year lifetime inhalation bioassay, female mice showed a significantly increased incidence of pulmonary alveolar and bronchiolar adenomas. On this basis, NTP has determined that there is some evidence of naphthalene carcinogenicity in female mice. Both male and female mice showed evidence of chronic inflammation and its associated response in the respiratory system.

Reports have associated repeated and prolonged occupational overexposure to solvents with permanent brain and nervous system damage (sometimes referred to as solvent or painter's syndrome). Intentional misuse by deliberately concentrating and inhaling this product may be harmful or fatal.

WARNING: The use of any hydrocarbon fuel in an area without adequate ventilation may result in hazardous levels of combustion products and inadequate oxygen levels.

CARCINOGENICITY

Wholly vaporized unleaded gasoline produced an increased incidence of liver cancers in female mice and kidney cancers in male rats following a two-year inhalation period. Subsequent investigations indicate that kidney damage, linked to kidney cancer, may be specific to the male rat. IARC has determined that there is limited evidence for the carcinogenicity of unleaded gasoline in experimental animals and inadequate evidence in humans. (IARC Class-2B). Solvent extracts of gasoline exhaust particles produced skin cancer in laboratory animals leading IARC to categorize gasoline engine exhaust as a possible human cancer hazard.

This material contains ethylbenzene. Ethylbenzene has shown clear evidence of carcinogenicity in male rats and some evidence of carcinogenicity in female rats and male and female mice.

TERATOGENICITY, MUTAGENICITY, OTHER REPRODUCTIVE EFFECTS

This product contains components which have been shown to be positive in mutagenicity assays.

This product contains components which may cause adverse reproductive and/or developmental effects.

Pregnant women may be at an increased risk from exposure. Consumption of alcoholic beverages may enhance toxic effects.

This product may contain methyl tert-butyl ether (MTBE). Chronic exposure to very high concentrations (3000 and 8000 ppm) of MTBE resulted in an increased incidence of tumors, produced urinary system effects and maternal and/or fetal toxicity in laboratory animals. This material was tested in a number of mutagenicity assays and the results were generally negative. However, they were positive in a Mouse Lymphoma Assay. The significance of these findings for human health hazards is unclear. Damages genetic material in some short-term test systems. May cause adverse reproductive and/or developmental effects. These effects appear to occur at doses that are maternally toxic.

PRE-EXISTING CONDITIONS AGGRAVATED BY EXPOSURE

Pre-existing medical conditions which may be aggravated by exposure include disorders of the kidney, liver, skin, blood, eyes, immune, cardiovascular, respiratory and nervous systems.

12 ECOLOGICAL INFORMATION

ECOTOXICOLOGICAL INFORMATION

ND

13 DISPOSAL CONSIDERATIONS

WASTE DISPOSAL

This product, as supplied, when discarded or disposed of, is a hazardous waste according to Federal regulations (40 CFR 261) due to its ignitability and benzene content. Under the Resource Conservation and Recovery Act (RCRA), it is the responsibility of the user of the product to determine, at the time of disposal, whether the material is a hazardous waste subject to RCRA.

The transportation, storage, treatment and disposal of RCRA waste material must be conducted in compliance with 40 CFR 262, 263, 264, 268 and 270. Disposal can occur only in properly permitted facilities. Check state and local regulations for any additional requirements as these may be more restrictive than federal laws and regulations. Chemical additions, processing or otherwise altering this material may make the waste management information presented in this MSDS incomplete, inaccurate or otherwise inappropriate. Disposal of this material must be conducted in compliance with all federal, state and local regulations.

14 TRANSPORT INFORMATION

BILL OF LADING - BULK (U. S. DOT)

Gasoline, 3, UN1203, PG II RQ, (Xylenes, Benzene)

BILL OF LADING - NON-BULK (U. S. DOT)

Gasoline, 3, UN1203, PG II, RQ (Xylenes, Benzene)

U. S. Department of Transportation (DOT) Requirements

General Transportation Information for Bulk Shipments

Proper Shipping Name	Gasoline		
Hazard Class	3	UN/NA Code	UN1203
Packaging Group	PG II		
Labels Required	Flammable Liquid		
Placards Required	Flammable Liquid, UN1203		
Reportable Quantity	See Regulatory Information (Section 15)		

General Transportation Information for Non-Bulk Shipments

Proper Shipping Name	Gasoline		
Hazard Class	3	UN/NA Code	UN1203
Packaging Group	PG II		
Labels Required	Flammable Liquid		
Placards Required	Flammable Liquid, UN1203		
Reportable Quantity	See Regulatory Information (Section 15)		

The above description may not cover shipping in all cases, please consult 49 CFR 172.101 for specific shipping information.

5 REGULATORY INFORMATION

FEDERAL REGULATIONS

All ingredients are on the TSCA inventory or are not required to be listed on the TSCA inventory.

Consult OSHA's Benzene standard 29 CFR 1910.1028 for provisions on air monitoring, employee training, medical monitoring, etc.

This product may be subject to export notification under TSCA section 12(b): contains: tert-Amyl methyl ether (CAS# 994-05-8), Methyl tert-butyl ether (CAS# 1634-04-4), Cyclohexane (CAS#110-82-7).

A release of this product, as supplied, is exempt from reporting under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) by the petroleum exclusion. Releases may be reportable to the National Response Center (800-424-8802) under the Clean Water Act, 33 U.S.C. 1321(b)(3) and (5). Check state and local regulations for any additional requirements as these may be more restrictive than federal laws and regulations. Failure to report may result in substantial civil and criminal penalties.

This product, as supplied, contains cumene, methanol, hexane, toluene, MTBE, ethylbenzene, cyclohexane, naphthalene, xylenes and benzene which are Hazardous Substances as per 40 CFR Part 302.4. The reportable quantities for cumene, methanol, hexane, toluene, MTBE, ethylbenzene, cyclohexane, naphthalene, xylenes and benzene are 5000,5000,5000,1000,1000,1000,1000,100,100, and 10 pound(s), respectively. Any release of this product that results in a release of cumene, methanol, hexane, toluene, MTBE, ethylbenzene, cyclohexane, naphthalene, xylenes and benzene equal to or exceeding the reportable quantity must be reported to the National Response Center (800-424-8802) and appropriate state and local regulatory agencies as described in 40 CFR Part 302.6 and 40 CFR 355.40, respectively.

This product contains one or more components designated as hazardous substances or toxic pollutants pursuant to the Federal Clean Water Act (40 CFR 116.4 Table A; 40 CFR 401.15). Any unpermitted introduction of this product into a facility stormwater or wastewater discharge may constitute a violation of the Clean Water Act. Facilities must notify the appropriate permitting agency prior to introducing this product into the aforementioned discharges.

This product contains one or more substances listed as hazardous, toxic or flammable air pollutants under Section 112 of the Clean Air Act.

There may be specific regulations at the local, regional or state/provincial level that pertain to this product.

STATE REGULATIONS

WARNING: This product contains a chemical known to the State of California to cause cancer and birth defects or other reproductive harm.

SARA TITLE III RATINGS

Immediate Hazard: X Delayed Hazard: X Fire Hazard: X Pressure Hazard: -

Reactivity Hazard: -

NFPA RATINGS

Health	1	Flammability	4	Reactivity	0	Special Hazards	-

HMIS RATINGS

Health	2*	Flammability	4	Reactivity	0

Following ingredients of this product are listed in SARA313

SARA Listed Ingredient Name	CAS Number	Maximum %
TOLUENE	108-88-3	20.0
XYLENES	1330-20-7	18.0
METHYL-T-BUTYL ETHER	1634-04-4	15.0
N-HEXANE	110-54-3	7.0
T-BUTYL ALCOHOL	75-65-0	7.0
ETHYLBENZENE	100-41-4	4.0
CYCLOHEXANE	110-82-7	3.0
METHYL ALCOHOL	67-56-1	3.0
1,2,4-TRIMETHYLBENZENE	95-63-6	2.0
BENZENE	71-43-2	1.3
NAPHTHALENE	91-20-3	1.0
CUMENE	98-82-8	1.0

6 OTHER INFORMATION

DISCLAIMER

NOTICE: The information presented herein is based on data considered to be accurate as of the date of preparation of this Material Safety Data Sheet. However, MSDS may not be used as a commercial specification sheet of manufacturer or seller, and no warranty or representation, expressed or implied, is made as to the accuracy or comprehensiveness of the foregoing data and safety information, nor is any authorization given or implied to practice any patented invention without a license. In addition, no responsibility can be assumed by vendor for any damage or injury resulting from abnormal use, from any failure to adhere to recommended practices, or from any hazards inherent in the nature of the product.

Current Revision Date 11-Apr-2000 Replaces Sheet Dated 23-Dec-1998

Completed By Safety & Emergency Response, Koch Industries, Inc.

Material Safety Data Sheet

conoco

Emergency Medical Telephone (800) 441-3637

NO. 1 DIESEL FUEL/NO. 1 FUEL OIL

I. MATERIAL IDENTIFICATION

Name	CAS Registry Number	Transportation Emergency Phone
No. 1 Diesel Fuel/No. 1 Fuel Oil	Mixture; See Section XI	1-(800) 424-9300 (Chemtrec)

Chemical Family	Product Code
Mixed Petroleum Hydrocarbon	3501/4195

II. OSHA HAZARD DETERMINATION

The material is hazardous as defined by OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Refer to Section XI of this MSDS for federal and state regulatory information.

Hazardous Ingredients	CAS Registry Number	Concentration
Hydrocarbons (Aromatic & Paraffinic)	Mixture	>90%
Naphthalene	91-20-3	Approx. 3%

Hazardous Physical Properties
Class II Combustible Liquid - NFPA 30-1987.

III. PHYSICAL DATA

Appearance and Odor
Clear liquid;
Paraffinic odor

Specific Gravity (H_2O=1)
0.81

Boiling Point/Range
330° - 572°F

% Volatiles (by volume)
Nil

Vapor Pressure (mmHg), 68°F
2

Solubility in Water
Insoluble

Vapor Density (Air = 1.0)
>1

IV. REACTIVITY DATA

Stable: X Unstable: ___

Hazardous Decomposition Materials: Incomplete combustion may produce carbon monoxide.

Conditions to Avoid: Oxidizing materials, heat, flame.

Hazardous Polymerization: Will not occur.

Conoco Inc., P.O. Box 2197, Houston, TX 77252
General Information No. (713) 293-5550

V. FIRE AND EXPLOSION HAZARD DATA

LEL: 0.5 UEL: 6

Flash Point (Method used): 115°F (TCC)

Autoignition Temperature: 410°F

Handle and store in accordance with NFPA procedure for Class II Combustible Liquid.

Extinguishing Media: Use water spray, dry chemical, CO_2, foam.

Special Fire Fighting Procedures: Use water to keep fire-exposed containers cool. If leak or spill has not ignited, use water spray to disperse the vapors and to provide protection for personnel attempting to stop a leak. Water spray may be used to flush spills away from exposures.

Unusual Fire and Explosion Hazards: Products of combustion may contain carbon monoxide, carbon dioxide and other toxic materials. Do not enter enclosed or confined space without proper protective equipment including respiratory protection.

National Fire Protection Association (NFPA) Classification
Health 0 Fire 2 Reactivity 0

HAZARD RATING
Least-0 Slight-1 Moderate-2
High-3 Extreme-4

VI. TRANSPORTATION AND STORAGE

Storage Conditions:
Store in accordance with National Fire Protection Association regulations.

Shipping Information:
DOT:

Proper Shipping Name:	Diesel Fuel or Fuel Oil
Hazard Class:	Combustible Liquid
UN/NA No.:	NA 1993
DOT Label(s):	None
DOT Placard:	Combustible

IATA/IMO:

Proper Shipping Name:	Gas Oil
Hazard Class:	3 (IMO 3.3)
UN No.:	UN 1202
IMO/ICAO Label:	Flammable Liquid
Special Information:	Not restricted over 140°F
Packaging Group:	III

VII. HEALTH HAZARD INFORMATION

Exposure Limits for No. 1 Diesel Fuel, No. 1 Fuel Oil

PEL: None Established
TLV: None Established

Du Pont AEL: None Established

Exposure Limits for Petroleum Distillates

PEL: 400 ppm; 1600 mg/m³ TWA

Exposure Limits for Naphthalene

PEL: 10 ppm, 50 mg/m³
STEL 15 ppm, 75 mg/m³
TLV: 10 ppm, 50 mg/m³
STEL 15 ppm, 75 mg/m³

Du Pont AEL: None Established

Primary Routes of Exposure/Entry: Skin, Inhalation.

Signs and Symptoms of Exposure/Medical Conditions Aggravated by Exposure:
Studies with mice or rats have shown that some petroleum distillates have caused either damage or tumors of the kidneys or tumors of the liver. However, kidney effects were not seen in similar studies involving guinea pigs, dogs or monkeys. Also, the significance of the liver tumors in rodents is highly speculative.

Mouse skin painting studies have shown that petroleum middle distillates (boiling range of 100° - 700°F; naphtha, jet fuel, diesel fuel, kerosene, etc.) can cause skin cancer when repeatedly applied and never washed from the animal's skin. The relative significance of this to human health is uncertain since the petroleum distillates were not washed from the skin and resulting skin effects (irritation, cell damage, etc.) may play a role in the tumorigenic response. A few studies have shown that washing the animal's skin with soap and water between treatments greatly reduces the carcinogenic effect of some petroleum oils.

Studies in mice and rats have shown that chronic exposure (8 hours/day, 7 days/week, 24 months) to unfiltered diesel exhaust produced tumors of the lung and also lymphomas. On the basis of these studies, NIOSH recommends that whole diesel exhaust be regarded as a potential carcinogen.

The product contains petroleum hydrocarbons, and as with many petroleum products, it may cause irritation to the eyes, lungs or skin after prolonged or repeated exposure. Extreme exposure or aspiration into the lungs may cause pneumonia. Overexposure may cause weakness, headache, nausea, confusion, blurred vision, drowsiness and other nervous system effects; greater exposure may cause dizziness, slurred speech, flushed face, unconsciousness or convulsions.

Naphthalene is a potential irritant to eyes, skin and lungs and may damage the blood, eyes and kidney after prolonged or repeated exposure.

Listed as Carcinogen or Potential Carcinogen by:

Material	NTP	IARC	OSHA
	No	No	No

VIII. EMERGENCY AND FIRST AID INFORMATION

Eyes: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

Skin: In case of contact, immediately wash skin with soap and plenty of water. If irritation develops, consult a physician.

Inhalation: If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

Ingestion: If swallowed, do not induce vomiting. Give large quantities of water. Never give anything by mouth to an unconscious person. Call a physician.

Notes to Physician: Gastric lavage by qualified medical personnel may be considered, depending on quantity of material ingested.

IX. SPILL, LEAK AND DISPOSAL INFORMATION

In Case of Spill or Leak: This material is combustible. Contain spill immediately in smallest possible area. Recover as much product as possible by such methods as vacuuming, followed by recovering residual fluids by using absorbent materials. Nonrecoverable product, contaminated soil, debris and other materials should be placed in proper containers for ultimate disposal. Avoid washing, draining or directing material to storm or sanitary sewers.

NOTE: Review FIRE AND EXPLOSION HAZARDS before proceeding with clean up. Use appropriate PERSONAL PROTECTIVE EQUIPMENT during clean up.

Waste Disposal Method: Recycle as much of the recoverable product as possible. Treatment, storage, transportation and disposal must be in accordance with applicable Federal, State/Provincial, and Local regulations.

X. PRECAUTIONARY MEASURES

Respiratory Protection: Select appropriate NIOSH-approved respiratory protection when needed to avoid inhalation of mist or vapors and to maintain exposures below acceptable limits.

Ventilation: Natural or general mechanical ventilation normally adequate.

Protective Gloves: Impervious gloves, such as neoprene or NBR, should be worn when the potential exists for prolonged or repeated skin exposure.

Eye Protection: Chemical goggles required when exposed to spray or mist or if splashing is probable.

Other Protective Equipment: Coveralls if splashing is probable. Launder contaminated clothing before reuse.

Safety Precautions: Avoid contact with eyes, skin, or clothing.

XI. REGULATORY INFORMATION

FEDERAL REGULATIONS

CERCLA, 40 CFR 302
The material contains the following hazardous substance which, when released in quantities equal to or exceeding the Reportable Quantity, triggers National Response Center notification requirements.

Hazardous Substance	Reportable Quantity
Not Applicable	

SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986, TITLE III SECTIONS 302, 304, 311, 312, 313

SECTION 302/304 - Extremely Hazardous Substances (40 CFR 355)
The material does not contain extremely hazardous substances at greater than 1.0% concentration; however, it is possible that this material may contain extremely hazardous substances at a lower concentration so that a large enough spill could warrant an Emergency Release Report under Section 304.

SECTION 311/312 - MSDS and Chemical Inventory Reporting Requirements (40 CFR 370)
The material should be reported under the following EPA hazard categories:

X Immediate (Acute) Health Hazard	__ Sudden Release of Pressure
X Delayed (Chronic) Health Hazard	__ Reactive
X Fire	__ Not Applicable

NOTE: See Section II for the concentration of any ingredients classified as hazardous by OSHA.

SECTION 313 - List of Toxic Chemicals (40 CFR 372)
The material contains the following chemical(s) at a level of 1.0% or greater (0.1% for carcinogens) on the list of Toxic Chemicals and is subject to toxic chemical release reporting requirements.

Toxic Chemical	CAS Registry Number	Approx. Concentration (Upper Bound)
Naphthalene	91-20-3	3%

TOXIC SUBSTANCES CONTROL ACT (TSCA), 40 CFR 710
This material is a mixture as defined by TSCA. The chemical ingredients in this material are in Section 8(b) Chemical Substance Inventory and/or are otherwise in compliance with TSCA. In the case of ingredients obtained from other manufacturers, Conoco relies on the assurance of responsible third parties in providing this statement.

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA), 40 CFR 261, SUBPART C AND D
The material, when discarded or disposed of, is not specifically listed as a hazardous waste in Federal regulations; however, it could be considered hazardous if it meets criteria for being toxic, corrosive, ignitable or reactive according to U.S. EPA definitions (40 CFR 261). Additionally, it could be designated as hazardous according to state regulations. This material could also become a hazardous waste if it is mixed with or comes in contact with a listed hazardous waste. If such contact or mixing occurs, check 40 CFR 261 to determine whether it is a hazardous waste. If it is a hazardous waste, Regulations 40 CFR 262, 263, 264 and 268 may apply.

FEDERAL WATER POLLUTION CONTROL ACT, CLEAN WATER ACT, 40 CFR 401.15, 40 CFR 116
The material contains the following ingredient(s) which is considered hazardous if spilled in navigable waters.

Ingredient	Reportable Quantity
Petroleum Hydrocarbon	Film or sheen upon or discoloration of the water surface or adjoining shoreline

HAZARDOUS MATERIALS TRANSPORTATION REGULATIONS, 49 CFR 171-178
The material contains the following ingredient(s) which is considered a hazardous substance as defined by 49 CFR 171.8 if spilled while being transported in commerce.

Ingredient	Reportable Quantity
Not Applicable	

FOREIGN REGULATION

CANADIAN HAZARDOUS PRODUCTS ACT (WHMIS)
The material is a WHMIS Controlled Product and a Canadian MSDS is available.

STATE REGULATIONS

CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 ("PROPOSITION 65")
The material contains the following ingredient(s) known to the State of California to cause cancer, birth defects or other reproductive harm. Read and follow label directions and use care when handling or using all petroleum products.

Ingredient
None

PENNSYLVANIA WORKER AND COMMUNITY RIGHT TO KNOW ACT
The material contains the following hazardous substances:
Categories: H = Hazardous Substance (≥ 1.0%)
S = Special Hazardous Substance (≥ 0.01%)
E = Environmental Hazard (≥ 1.0%)

Ingredient	CAS Registry Number	Category
Aromatic & Paraffinic Hydrocarbons	Mixture	H
Naphthalene	91-20-3	E

Nonhazardous ingredient(s) information is withheld as trade secret in accordance with Section 11 of Pennsylvania Worker and Community Right to Know Act.

CONOCO

MSDS

GASC0220 Revised 1-SEP-1993 Printed 6-SEP-1993

No. 2 Diesel Fuel

CHEMICAL PRODUCT/COMPANY IDENTIFICATION

Material Identification
CAS Number 68476-34-6

 # Tradenames and Synonyms
Diesel Fuel No. 2, Low Sulfur
Diesel Fuel No. 2, High Sulfur

3502, 3504, 3510, 3512

Company Identification
MANUFACTURER/DISTRIBUTOR
CONOCO INC.
P.O. BOX 2197
HOUSTON, TX 77252

PHONE NUMBERS
Product Information 1-713-293-5550
Transport Emergency CHEMTREC 1-800-424-9300
Medical Emergency 1-800-441-3637

COMPOSITION/INFORMATION ON INGREDIENTS

Components

Material	CAS Number	%
Diesel Fuel, No. 2	68476-34-6	100

HAZARDS IDENTIFICATION

Potential Health Effects

Primary Routes of Exposure/Entry: Skin, Inhalation.

Signs and Symptoms of Exposure/Medical Conditions Aggravated by Exposure:
The product may cause irritation to the eyes, lungs, and skin after prolonged or repeated exposure. Extreme

(Continued)

HAZARDS IDENTIFICATION (Continued)

overexposure or aspiration into the lungs may cause lung damage and death. Overexposure may cause weakness, headache, nausea, confusion, blurred vision, drowsiness, and other nervous system effects; greater exposure may cause dizziness, slurred speech, flushed face, unconsciousness, and convulsions.

It is highly unlikely that human exposure at or below the recommended exposure level poses a significant health hazard. In this regard, good workplace practices and proper engineering designs will minimize exposure.

Decomposition Products:
Studies in mice and rats have shown that chronic exposure (8 hours/day, 7 days/week, 24 months) to unfiltered diesel exhaust produced tumors of the lung and also lymphomas. On the basis of these studies, NIOSH recommends that whole diesel exhaust be regarded as a potential carcinogen.

Carbon monoxide is a gas that can result from incomplete combustion of hydrocarbons, from detoxification of some chemicals like methylene chloride, tobacco smoke, and even from natural body processes. Carbon monoxide binds tightly to hemoglobin and interferes with oxygen transport to body tissues. Overexposure can cause headache, nausea, nervous system depression, coma, and death.

Carcinogenicity Information
None of the components in this material is listed by IARC, NTP, OSHA or ACGIH as a carcinogen.

FIRST AID MEASURES

First Aid

INHALATION

If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

SKIN CONTACT

Wash skin thoroughly with soap and water after handling. If irritation develops and persists, consult a physician.

EYE CONTACT

In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

INGESTION

If swallowed, do not induce vomiting. Immediately give 2 glasses

(Continued)

ACCIDENTAL RELEASE MEASURES (Continued)

NOTE: Vapors released from the spill may create an explosive atmosphere.

Initial Containment
Dike spill. Prevent material from entering sewers, waterways, or low areas.

Spill Clean Up
Soak up with sawdust, sand, oil dry or other absorbent material.

HANDLING AND STORAGE

Handling (Personnel)
Avoid breathing vapors or mist. Wash thoroughly after handling. Wash clothing after use.

Handling (Physical Aspects)
Ground container when pouring. Keep away from heat, sparks and flames.

Storage
Store in a well ventilated place. Keep container tightly closed. Store in accordance with National Fire Protection Association recommendations. Store away from heat, sparks and flames, oxidizers.

EXPOSURE CONTROLS/PERSONAL PROTECTION

Engineering Controls
Use only with adequate ventilation. Keep container tightly closed.

Personal Protective Equipment
Respiratory Protection: Select appropriate NIOSH-approved respiratory protection when needed to avoid inhalation of mist or vapors and to maintain exposures below acceptable limits.

Protective Gloves: Impervious gloves, such as neoprene or NBR, should be worn when the potential exists for prolonged or repeated skin exposure.

Eye Protection: Safety glasses with side shields. Chemical goggles required when exposed to spray or mist or if splashing is probable.

Other Protective Equipment: Coveralls if splashing is probable. Launder contaminated clothing before reuse.

Exposure Guidelines
Exposure Limits
No. 2 Diesel Fuel

PEL	(OSHA)	None Established
TLV	(ACGIH)	None Established

(Continued)

FIRST AID MEASURES (Continued)

of water. Never give anything by mouth to an unconscious person. Call a physician.

Notes to Physicians
Activated charcoal mixture may be administered. To prepare activated charcoal mixture, suspend 50 grams activated charcoal in 400 mL water and mix thoroughly. Administer 5 mL/kg, or 350 mL for an average adult.

FIRE FIGHTING MEASURES

Flammable Properties

Flash Point	130 F (54 C)
Method	TCC
Flammable limits in Air, % by Volume	
LEL	0.4
UEL	8
Autoignition	494 F (257 C)

Vapor forms explosive mixture with air. Vapors or gases may travel considerable distances to ignition source and flash back.

NFPA Classification Class II Combustible Liquid.

Extinguishing Media
Water Spray, Foam, Dry Chemical, CO2.

Fire Fighting Instructions
Special Fire Fighting Procedures: Use water to keep fire-exposed containers cool. If leak or spill has not ignited, use water spray to disperse the vapors and to provide protection for personnel attempting to stop a leak. Water spray may be used to flush spills away from exposures.

Unusual Fire and Explosion Hazards: Products of combustion may contain carbon monoxide, carbon dioxide and other toxic materials. Do not enter enclosed or confined space without proper protective equipment including respiratory protection.

ACCIDENTAL RELEASE MEASURES

Safeguards (Personnel)
NOTE: Review FIRE FIGHTING MEASURES and HANDLING (PERSONNEL) sections before proceeding with clean-up. Use appropriate PERSONAL PROTECTIVE EQUIPMENT during clean-up.

Remove source of heat, sparks, flame, impact, friction and electricity including internal combustion engines and power tools. If equipment is used for spill cleanup, it must be explosion proof and suitable for flammable liquid and vapor.

(Continued)

PHYSICAL AND CHEMICAL PROPERTIES

 # Physical Data

Boiling Point	350-690 F (177-366 C)
Vapor Pressure	1 mm/Hg @ 68 F (20 C)
Vapor Density	>1 (Air = 1)
% Volatiles	(by volume) Nil
Solubility in Water	Insoluble
Odor	Aromatic
Form	Liquid
Color	*
Specific Gravity	0.84-0.88 @ 60 F (16 C))

*Color : High Sulfur Diesel - Green
Others - Clear or Light Yellow

STABILITY AND REACTIVITY

Chemical Stability
Stable at normal temperatures and storage conditions.

Conditions to Avoid
Avoid heat, sparks, and flame.

Incompatibility with Other Materials
Incompatible or can react with strong oxidizers.

Decomposition
Incomplete combustion may produce carbon monoxide.

Polymerization
Polymerization will not occur.

TOXICOLOGICAL INFORMATION

Animal Data
Animal studies have shown that prolonged or repeated inhalation exposures to high concentrations of some petroleum distillates have caused liver tumors in mice and kidney damage and tumors in male rats. However, kidney effects were not seen in similar studies involving female rats, guinea pigs, dogs, or monkeys. Present studies indicate the kidney effects will only occur in male rats. Also, human studies do not indicate this peculiar sensitivity for kidney damage and studies reported in 1992 showed that this particular type of rat kidney damage is not useful in predicting a human health hazard. The significance of liver tumors in mice exposed to high doses of chemicals is highly speculative and probably not a good indicator for predicting a potential human carcinogenic hazard.

Mouse skin painting studies have shown that petroleum middle distillates (boiling range 100-700 F; naphtha, jet fuel, diesel fuel, kerosene, etc.) can cause skin cancer when repeatedly applied and never washed from the animal's skin. The relative

(Continued)

TOXICOLOGICAL INFORMATION (Continued)

significance of this to human health is uncertain since the petroleum distillates were not washed from the skin and resulting skin effects (irritation, cell damage, etc.) may play a role in the tumorigenic response. A few studies have shown that washing the animal's skin with soap and water between treatments greatly reduces the carcinogenic effect of some petroleum oils.

Diesel Fuel -
Skin : Extremely irritating; no mortality at 5 ml/kg in rabbits
Oral : LD50 of 9 ml/kg in rats

DISPOSAL CONSIDERATIONS

Waste Disposal
Treatment, storage, transportation, and disposal must be in accordance with applicable Federal, State/Provincial, and Local regulations. Do not flush to surface water or sanitary sewer system.

By itself, the liquid is expected to be a RCRA ignitable hazardous waste.

TRANSPORTATION INFORMATION

Shipping Information
INTERNATIONAL HM-181

Proper Shipping Name	Gas Oil
Hazard Class	3
UN/NA Number	UN 1202
Packing Group	III
Label	Flammable liquid
Placard	Flammable

DOMESTIC HM-181

Proper Shipping Name	Diesel fuel
Hazard Class	Combustible liquid
UN/NA Number	NA 1993
Packing Group	III
Label	None
Placard	Combustible
Special Information	If shipped by vessel or air, use international description.

(Continued)

REGULATORY INFORMATION

U.S. Federal Regulations

OSHA HAZARD DETERMINATION
This material is hazardous as defined by OSHA's Hazard Communication Standard, 29 CFR 1910.1200.

CERCLA/SUPERFUND
Not applicable; this material is covered by the CERCLA petroleum exclusion. Releases are not reportable.

SARA, TITLE III, 302/304
This material is not known to contain extremely hazardous substances.

TITLE III HAZARD CLASSIFICATIONS SECTIONS 311, 312

Acute	: Yes
Chronic	: Yes
Fire	: Yes
Reactivity	: No
Pressure	: No

SARA, TITLE III, 313
This material is not known to contain any chemical(s) at a level of 1.0% or greater (0.1% for carcinogens) on the list of Toxic Chemicals and subject to release reporting requirements.

TSCA
This material is in the TSCA Inventory of Chemical Substances (40 CFR 710) and/or is otherwise in compliance with TSCA.

RCRA
This material, when discarded or disposed of, is not specifically listed as a hazardous waste in Federal regulations. It could become a hazardous waste if it is mixed with, or comes in contact with, a listed hazardous waste. If it is a hazardous waste, regulations at 40 CFR 262-266 and 268 may apply.

CLEAN WATER ACT
The material contains the following ingredient(s) which is considered hazardous if spilled into navigable waters and therefore reportable to the National Response Center (1-800-424-8802).

Ingredient(s)	Petroleum Hydrocarbons
Reportable Quantity	Film or sheen upon, or discoloration of, any water surface.

State Regulations (U.S.)

CALIFORNIA "PROP 65"
This material is not known to contain any ingredient(s) subject to the Act.

PENNSYLVANIA WORKER & COMMUNITY RIGHT TO KNOW ACT
This material contains the following ingredient(s) subject to the

(Continued)

REGULATORY INFORMATION (Continued)

Pennsylvania Worker and Community Right to Know Hazardous Substances List.

Ingredient	Diesel Fuel Oil
Category	Hazardous Substance

Canadian Regulations

CLASS B Division 3 - Combustible Liquid.

CLASS D Division 2 Subdivision B - Toxic Material. Chronic Toxic Effects.

Transport/Medical Emergency Phone Number: 1-613-348-3616

OTHER INFORMATION

NFPA, NPCA-HMIS

NFPA Rating	
Health	0
Flammability	2
Reactivity	0

NPCA-HMIS Rating	
Health	1
Flammability	2
Reactivity	0

Personal Protection rating to be supplied by user depending on use conditions.

The data in this Material Safety Data Sheet relates only to the specific material designated herein and does not relate to use in combination with any other material or in any process.

Responsibility for MSDS	MSDS Administrator
Address	Conoco Inc. PO Box 2197 Houston, TX 77252
Telephone	713/293-5550

# Indicates updated section.

End of MSDS

ATTACHMENT 3:

Emergency Response Inventory and Location Map

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont, Illinois

SPCC PLAN (9/2001) -- ATTACHMENT 3:

Emergency/Spill Response Equipment Inventory

Containment Boom - 450' (min.) -- Maintained under EMC's Coast Guard Emergency Response Plan

Absorbent Boom - 200' (min.)

Absorbent Pads - 20-30 bundles of 144 (min.)

Spill recovery pumps - 100 pumps from 2" - 18" in size with sufficient hoses/couplings etc.

Fire Extinguisher - (1 doz. min.)

Heavy Equipment:
- (2) End Loaders
- (1) Bobcat
- (1) Backhoe
- (1) Bull-Dozer

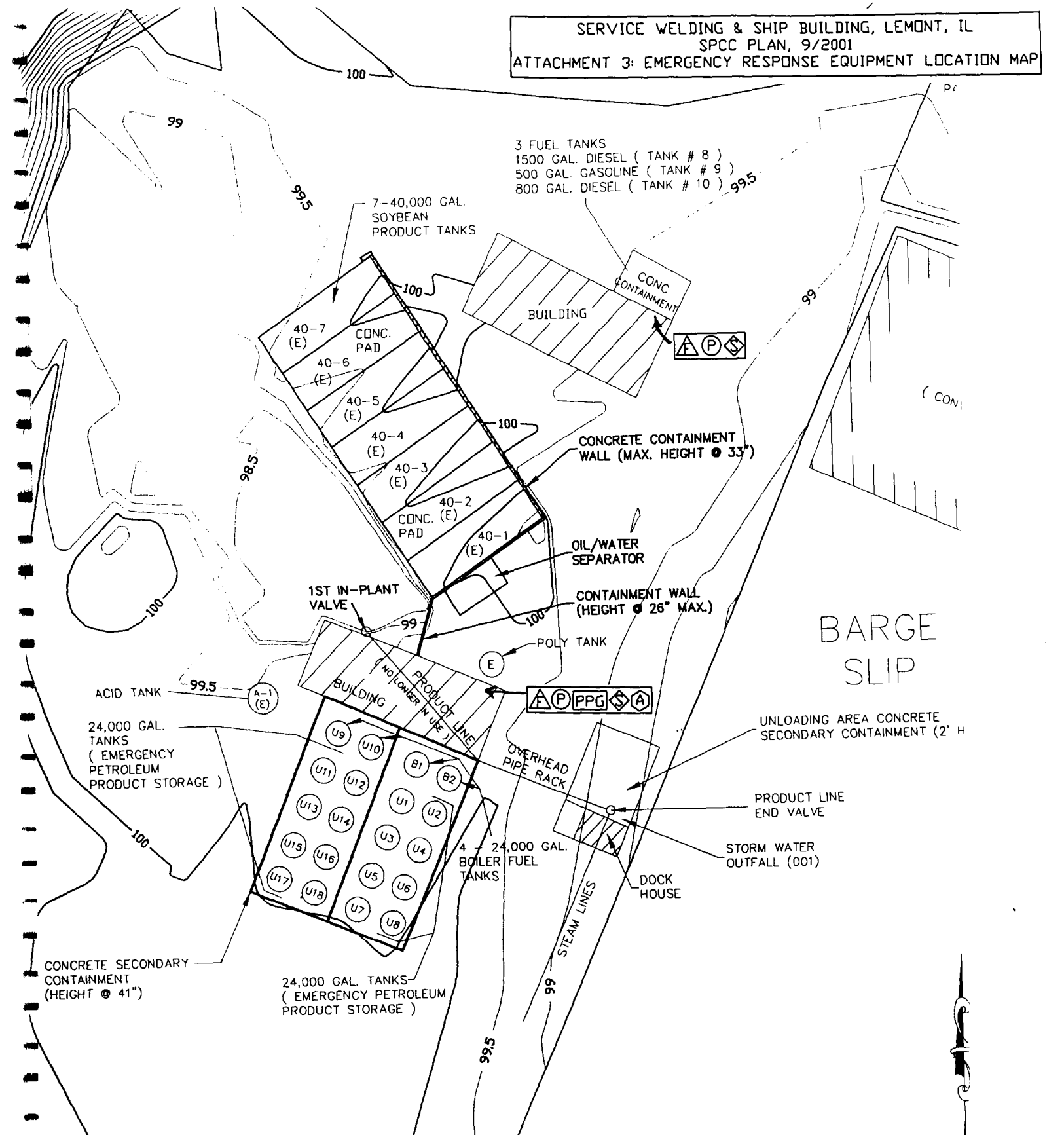
Misc. Equipment - Shovels, Tools

Containment Booms, Pumps

First Aid Kit/Portable Eyewash

Refer to Attached Site Plan Map for location of above referenced equipment.

SERVICE WELDING & SHIP BUILDING, LEMONT, IL
SPCC PLAN, 9/2001
ATTACHMENT 3: EMERGENCY RESPONSE EQUIPMENT LOCATION MAP



LEGEND:

- B1 = TANK IDENTIFICATION #
- E = EMPTY TANK
- (E) = TO BE EMPTIED TANK

EMERGENCY RESPONSE EQUIPMENT:

- (F) = FIRE EXTINGUISHERS
- (P) = PORTABLE PUMPS
- PPG = PERSONAL PROTECTIVE GEAR
- (S) = SPILL EQUIPMENT (ABSORBENTS, SHOVELS, ETC.)
- (A) = FIRST AID KIT AND EYE WASH STATIONS

NOTE: BLDGS. WITHIN PLANT CONTAIN A MINIMUM OF 6 FIRE EXTINGUISHERS MOUNTED ON THE INSIDE AND OUTSIDE OF THE BUILDINGS

ATTACHMENT 4:

EMC Onshore Facility Emergency Response Plan

EGAN MARINE CORPORATION

FACILITY RESPONSE PLAN

U.S. Department of Transportation
United States Coast Guard

Captain of the Port
U. S. Coast Guard

215 West 83rd Street, Suite D
Burr Ridge, IL 60521-7059
Phone: (708) 789-5830

16471
February 2, 1995

Egan Marine Corporation
Attn: Mr. Dennis Egan
P.O. Box 669
Lemont, IL 60439

Dear Mr. Egan,

Your facility response plan, Control Number FRP-54a, submitted to meet the requirements of the Oil Pollution Act of 1990 is approved.

I commend your efforts in developing a response plan that reflects your company's operating procedures and organizational structure. I remind you that your plan is a vital working document and that implementing the plan will help ensure effective oil spill response and mitigation. Please be sure that all parties with responsibilities under the plan are familiar with the plan's procedures and requirements.

You are reminded that your terminal is prohibited from handling, storing, transporting, transferring, or lightering oil unless it is operating in full compliance with this plan. Compliance includes ensuring that the required resources are in place and available through contract or other approved means. In addition, the facility must have a copy of the plan at the marine-transportation related portion of your facility. It is recommended that this copy be placed with your facility's operations manual.

Your plan's approval will remain valid until 5 years from the date of this letter. You must review your plan annually and resubmit the plan to the Coast Guard for reapproval 6 months before the end of the approval period as required by 33 CFR 154.1065.

A copy of this letter shall be with the plan.

Sincerely,

K. K. Kleckner
Lieutenant, U.S Coast Guard
By direction of the Captain
of the Port

Section 1 Purpose

The purpose of this Response Plan for a Marine Transportation Related Facility is to document procedures and policies implemented by Egan Marine Corporation to comply with the requirements of the Oil Pollution Act of 1990 (OPA 90). This plan identifies response sources and procedures, which will be implemented by the facility owner and operator to respond to an oil spill event.

Navigation and Vessel Inspection Circular No. 7-92 (NVIC 7-92) has been used as a guidance document for the preparation of this plan.

Section 2 Applicability

The Egan Marine Corporation Loading/Unloading Facility meets the definition of a marine transportation-related (MTR) facility because it is an on-shore facility, containing piping and structures, used for the transfer of oil to and from a vessel, and is subject to regulation under 33 CFR Part 154.

This facility handles and transfers oil in bulk to and from vessels which have capacities greater than 250 barrels. It meets the definition of a "facility that could reasonable be expected to cause significant and substantial harm", within the definition of that term contained in NVIC 7-92. Therefore, Section 8 of NVIC 7-92 is applicable, whereas Section 9 is not.

Section 3 Upgrading Facility Classification

The Captain of the Port (COTP) has the authority to upgrade the classification of this MTR facility, based on a consideration of all relevant factors including, but not limited to: type and quantity of oils handled in bulk; facility spill history; age of facility; proximity to public and commercial water supply intakes; and proximity to areas of economic importance or environmental sensitivity. According to NVIC 7-92, such a determination would be advisory only.

Section 4 Response Plan Submission Requirements

The Egan Marine Corporation Loading/Unloading Facility has been identified as a facility that may cause significant and substantial harm to the environment. Therefore, this response plan incorporates Section 7, 8, and 11.2 of NVIC 7-92.

Section 5 Definitions

All definitions used in this Plan are consistent with those definitions contained in NVIC 7-92, which are hereby incorporated by reference.

Section 6 Operating Restrictions and Interim Operating Authorization

The Egan Marine Corporation Loading/Unloading Facility recognizes that OPA 90 requires that a MTR facility must submit this response plan by February 18, 1993, in order to continue handling, storing, or transporting oil.

Additionally, this facility recognizes that it may not continue to operate after August 18,1993, unless it is in full compliance with the submitted response plan.

This plan need not be resubmitted if the final rules promulgated under OPA 90 are not significantly different than NVIC 7-92.

Section 7 General Response Plan Contents

The specific plan presented in Section 8, has been prepared in compliance with the requirements of Section 7 of NVIC 7-92, in that it:

(a) Has been written in plain English

(b) The response plan presented in Section 8 has been divided into the following sections:

(c) The plan contains the suggested contents of Section 8 of NVIC 7-92.

(d) Because this plan does follow the recommended guidelines, no cross-reference table has been submitted.

(e) It is the belief of this facility that the information contained in this response plan is consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR Part 300)

Section 8 Specific Guidelines for Facilities That May Cause Significant and Substantial Harm to the Environment

The outlining system presented in this section is the same as presented in NVIC 7-92.

(a) Introduction and plan content

(1) The emergency response plan has been prepared for the Egan Marine Corporation Barge Loading/Unloading dock facility, located at mile 302.1, Chicago Sanitary and Ship Canal, approximately 1/4 mile upstream of Lemont (Will County), Illinois in "B-Slip".

Egan Marine Corporation's office address is Old Canal Road, Lemont, IL.
The mailing address is PO Box 669, Lemont, IL 60439.

Egan Marine's phone numbers are as follows:

708-739-0947
708-739-4455 (FAX)

Egan Marine's President is Dennis Egan, phone 708-972-0948.

(2) The dock facility is located at mile 302.1 on the Chicago Sanitary and Ship Canal, 1/4 mile north of the Lemont Bridge crossing the canal.

(3) Egan Marine's designated responsible and qualified person is Dennis Egan, address Bluff Road, Lemont, IL 60439, phone 708-972-0948. Mobile telephone number: 708-975-6900.

The procedure for contacting the owner or operator is as follows:

During all times that transfers are in progress, an Egan Marine employee will be present as operator. Therefore, notification of any spill will be nearly instantaneous. Additionally, the operator is in constant radio communication with the barge. In the event of a spill, the operator will immediately contact Egan Marine's designated qualified person, or his replacement by telephone.

(4) A Table of Contents is presented at the beginning of this document.

(5) This plan conforms to the format specified in NVIC 7-92. Therefore, no cross reference is provided.

(6) A record of change(s) to record plan updates is provided following this page.

Record of Changes

	Date of Change	Changes Made to Page...	Nature of Change	Change Authorized by
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				
17.				
18.				
19.				

(b) Emergency response action plan

(1) Notification procedures

(i) Prioritized identification of person(s) to be notified in the event of a discharge or substantial threat of a discharge of oil.

(A) Facility Response Personnel

In the event of any spill emergency, the Egan Marine Corporation operator on duty shall do the following:

Immediately notify the barge operator to shut the barge's pumps off, and close the pump discharge valving (unloading operations).

Immediately shut off his transfer pump and close the pump discharge valving (loading operations).

The operator will place the following call after closing the shut off valve. Contact Dennis Egan, (708) 972-0948 (home), as primary qualified individual. If he is not available, Daniel Egan (708) 972-1116 (home) will be contacted as secondary qualified individual.

The primary, or secondary, qualified individual will make the following contacts:

Heritage Environmental, the designated oil spill response organization (OSRO).
Emergency number 708-378-1600

(B) Federal, state and local agencies

National Spill Response Center:	800-424-8800
Coast Guard MSO (7:30 AM to 4:00 PM):	708-789-5830
Coast Guard Milwaukee (4:00 AM- 7:30 AM):	414-747-7190
Illinois EPA:	708-345-9780
Will County Police:	815-727-6191
Lemont Fire Department (7:30 AM- 4:00 PM):	708-257-2376
Lemont Fire Department (4:00 PM- 7:30 AM):	708-257-2221

(ii) The following "Information on Discharge" form would be completed.

Information on Discharge

-Involved Parties-

(A) Reporting Party
Name
Phones ( ) -

Company
Position
Address
Address

City
State
Zip

(B) Suspected Responsible Party
Name
Phones ( ) -

Company
Organization Type:
Private citizen
Private enterprise
Public utility
Local government
State government
Federal government

City
State
Zip

Were Materials Released (Y/N)?
Calling for Responsible Party (Y/N)?

-Incident Description-

Source and/or Cause of Incident

Date - - Time :
Cause

Incident Address/Location

Nearest City

Distance from City

Storage Tank Type-Above ground(Y/N)?

Below ground(Y/N)?

Unknown

Tank Capacity

Facility Capacity

Latitude Degrees
Longitude Degrees
Mile Post or River Mile

-Materials-

Released Quantity
Unit of Measure

Released Material

Quantity in Water

-Remedial Action-

Actions taken to Correct or Mitigate Incident

-Impact-

Number of Injuries
Were there Evacuations (Y/N)?
Was there any Damage (Y/N)?

Number of Fatalities
Number Evacuated
Damage in Dollars

-Additional Information-

Any information about the Incident not recorded elsewhere in the report

-Caller Notifications: (Name/Time)-

EPA State USCG Other DESC

* IT IS NOT NECESSARY TO WAIT FOR ALL INFORMATION BEFORE CALLING NRC

(2) Facility's spill mitigation procedures

(i) Volume of persistent and non-persistent oils which could be involved in the:

(A) Average most probable discharge:

Equal to the lesser of 50 bbl or 1% of worst case spill

1% of worst case spill = 1.26 bbl

(B) Maximum most probable discharge:

Equal to the lesser of 1200 bbl or 105 of worst case spill

10% of worst case spill = 12.6 bbl

(C) Worst case discharge:

A worst case discharge is equal to the total of (1) line volume,(2)volume discharged during the time necessary to shut off the pump(s).

Worst case discharge = 53.1 bbl + 40 bbl + 33.3 bbl

= 126.4 bbl

(ii) Prioritized procedures for mitigating or preventing the consequences of a spill: In the event of any spill emergency, the Egan Marine Corporation operator on duty shall do the following:

Specific emergency/spill scenarios:

(A) Failure of manifold or other transfer equipment, or hoses, as appropriate:

Immediately notify the barge operator to shut the barge's pumps off, and close the pump discharge valving (during unloading operations).

Immediately shut off his transfer pump and close the pump discharge valving (during loading operations).

If the spill occurs during barge unloading operation, the operator will initiate calling procedures after closing the shut off valve.

If the spill occurred due to a break or leak in a line over the surface of the water, the operator will reposition the line, if possible, so that any spillage or drippage will be over the surface of the barge, the shore, or the secondary containment area.

(B) Tank overfill:
Not applicable

(C) Tank failure:
Not applicable

(D) Piping Rupture
See (A) above

(E) Piping leak, both under pressure and not under pressure, if applicable.
See (A) above

(F) Explosion and/or fire:
See (A) above

(G) Equipment failure:
See (A) above

(iii) Listing of Equipment and responsibilities of facility personnel to mitigate an average most probable discharge.

Listing of equipment:

Absorbent material will be stored on site for small spills on dock or barge. This includes individual 200 count 16.5 x 20" absorbent pads, each capable of 32 oz. of absorption, or 25 gallons per bale, and four (4) 8" x 10' sections of absorbent boom, for immediate containment of any spillage into canal. In the event of a possible release of product into waterway, one section of the boom would be placed at the front and rear of barge, extending from the barge to the dock face wall. This would prevent product from moving up or down stream. Absorbent pads would then be used to absorb product, until professional remediators are on site. Boom and absorbent pads are on site, located inside the operations shed. These materials are immediately available to Egan Marine personnel, and could be positioned in minutes. Egan Marine's OSRO would then be contacted to provide additional assistance as necessary.

esponsibilities of facility personnel to mitigate an average most probable spill:

It is the responsibility of all Egan Marine employees associated with the dock facility to implement the procedures specified in this plan in order to mitigate all spills.

(3) Facility's response activities

(i) This section covers facility personnel's responsibility to initiate a response and supervise response resources pending the arrival of the qualified individual.

It is the responsibility of all Egan Marine employees associated with the dock facility to implement the procedures specified in this plan in order to mitigate all spills, while waiting for the arrival of the qualified individual.

(ii) This section contains the qualified individual's responsibility, authority, and response time.

Egan Marine Corporation has delegated the responsibility and the authority to fully implement this plan to the qualified individual. The qualified individual can generally respond to the scene within 20 minutes of being notified of an incident. The designated alternate can generally respond to the scene within 20 minutes of being notified of an incident. Each individual has been delegated the full authority to:

(A) Activate and contract with necessary oil spill removal organization(s);

(B) Act as liaison with the predesignated Federal On-Scene Coordinator; and

(C) Obligate, either directly or through prearranged contracts, any funds required to carry out all necessary or directed oil response activities.

(iii) This plans contains the facility and/or corporate organizational structure that will be used to manage the following response actions:

(A) Command and Control: The Egan Marine Corporation operator on duty will assume command and control of the incident until relieved by the qualified individual, who will then assume this responsibility.

(B) Public information: The operator on duty will not be authorized to release information to the public (other than to duly authorized emergency response personnel). That function shall fall to the qualified individual, his alternate, or a Egan Marine Corporation officer, upon their arrival.

(C) Safety: The Egan Marine Corporation operator on duty will assume responsibility for safety until relieved by the qualified individual, who will then assume this responsibility.

(D) Liaison with government agencies: The Egan Marine Corporation operator on duty will assume responsibility for liaison with government agencies until relieved by the qualified individual, who will then assume this responsibility.

(E) Spill Operations: The Egan Marine Corporation operator on duty will assume responsibility for spill operations until relieved by the qualified individual, who will then assume this responsibility.

(F) Planning: The Egan Marine Corporation operator on duty will assume responsibility for planning until relieved by the qualified individual, who will then assume this responsibility.

(G) Logistics support: The Egan Marine Corporation operator on duty will assume responsibility for logistics support until relieved by the qualified individual, who will then assume this responsibility.

(H) Finance: The operator on duty will not be authorized to make financial arrangements, other than the contracting of spill response personnel as outlined above. That function shall fall to the qualified individual, his alternate, or a Egan Marine Corporation officer, upon their arrival.

iv) Identification of the oil spill removal organization:

The following is the oil spill contractor identified to assist in implementing the provisions of this emergency response plan:

Heritage Remediation/Engineering

This contractor has the following capabilities:

(A) To respond to the following spill scenarios:

(1) Maximum most probable discharge: and

(2) Worst case discharge to the maximum extent practicable: and

(B) Is capable of providing the following response resources:

(1) Equipment and supplies needed to meet the guidelines of Section 11. 2 of this plan, and

(2) Trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization and spill management team for the first 7 days of the response.

(v) This provision for mobile facilities is not applicable.

(vi) This plan lists the information on specific equipment in Appendix A of this plan. The oil spill removal organization identified above has stated that removal ratings given for his equipment have been determined in compliance with Appendix C of NVIC 7-92.

(4) Sensitive areas.

Egan Marine Corporation has sought to identify areas that are economically or environmentally sensitive. Based on the lack of commercial shelling or fishing in the area, it has been determined that there are not any areas which are "economically important" which might be affected by a worst case spill from the Egan Marine dock.

Egan Marine has also contacted numerous governmental agencies to determine if any "environmentally sensitive" areas are present. The Illinois Department of Energy and Natural Resources' Illinois Natural Historical Survey: Aquatic Biology Section was able to identify several areas of environmental sensitivity within approximately 22 miles of this facility.

(i) These areas which may be impacted by this facility are:

Area	Mile Location	Miles from Egan Marine Dock
Treat's Island	279.9	22.2
Confluence, DuPage River	277	25.1
Will County Forest Preserve	276	26.1

(ii) A map showing the sensitive areas, and the anticipated response action is presented in Appendix G.

(iii) Response activities anticipated to be utilized to protect the areas identified in (ii) above include placement of boom in order to protect the environmentally sensitive areas in such a manner as to protect these areas from direct contact with any floating oil, as well as to contain any floating oil which reaches these locations. Also, booms would be placed across the width of the slip, as close to the source of an oil sheen as possible, in order to contain the sheen.

(iv) Identification of equipment and described personnel available to protect areas of environmental sensitivity and economic importance as follows:

(A) For persistent oils, distance reached from the facility in 48 hours at maximum current:

Based on Corp. of Engineer's figures, the maximum daily flow rate experienced during the last seven years was 15,838 cfs. At Egan Marine's dock, the depth during such a peak flow should be expected to be 20 feet.

Therefore total cross-sectional area is 3300 sq. ft.

15,838 cfs divided by 3300 sq. ft. = 4.80 feet per second velocity. which equals 3.27 mph.

3.27 mph multiplied by 48 hours = 157 miles.

Mile 302.1 (Egan Marine's location) - 157 miles travel = Mile 145.1, which is approximately Coon Island, near Kingston Mines.

Notice: *The actual distance traveled would not be further than Mile 291 since the Lockport Locks are at that location and flow would not be able to proceed beyond that location.*

Personnel to be utilized in responding to spills in order to protect environmentally sensitive areas are employees of Egan Marine's spill response contractor. Equipment available to provide this protection is listed in Appendix A.

NOTICE: Egan Marine Corporation's primary strategy for protecting sensitive areas is to quickly place a boom across the width of B-Slip where the dock will be located. Egan Marine's spill response contractor has the capability to deploy boom across the entire width of the canal, downstream of a spill within 2 hours of the spill. At the maximum current of 3.27 mph, the theoretical spill could cover a distance of 6.5 miles, or Mile 295.6. Although the requirements of NVIC state that sensitive areas within the travel hours of 48 hours must be identified, the likelihood of needing to protect sensitive areas along 157 miles of the canal and river is extremely unlikely. Also, see Notice above.

(B) For persistent oils discharged into tidal waters: Not applicable.

(C) For non-persistent oils discharged into non-tidal waters: Not applicable.

(D) For non-persistent oils discharged into tidal waters: Not applicable.

(E) Substitution of spill trajectory or model: Not submitted.

(F) COTP determination that additional areas would need to be protected.

(v) Identification of equipment necessary to protect all areas of economic importance and environmental sensitivity identified in the ACP for the distance the oil is likely to travel for the geographical areas(s) and number of days listed in Table 2. This section is not applicable since the ACP has not yet been developed.

(5) Disposal activities: All oily and waste materials recovered during the response to the spill will be placed in suitable containers for temporary storage until disposal arrangements will be made. When necessary these arrangements will include obtaining disposal/treatment permits which comply with the requirements of all federal, state and local guidelines. Commercial waste disposal companies will be contacted to assist in this effort. All appropriate manifests will be completed.Products which are relatively uncontaminated will be returned to our processing stream as mandated by RCRA.

(c) Hazard evaluation [Reserved]

(d) Spill scenarios [Reserved]

(e) Training and drills

(1) Training procedures

All Egan Marine employees who are assigned as operators at the dock, the qualified individual and his alternate, and key corporate employees will be trained to meet the requirements of this plan. This training shall include:

A thorough study of the details of this plan.

Discussion and resolution of all questions raised by trainees.

Signing of a training log to indicate that the trainee understands the requirements of this plan.

Sufficient on-the-job training to assure that trainee can:

- Shut off all appropriate pumps
- Manipulate all necessary valves
- Deploy on-site spill response equipment
- Utilize on-site emergency communication equipment

Additional training details are provided in Section 12.0 of this plan.

(2) Drill procedures

Drill procedures are presented in Section 13.0 of this plan.

Plan review and update procedures

This plan shall be reviewed by Egan Marine's qualified individual every three months. If any changes are deemed to be warranted, they will be implemented and recorded on the appropriate form.

Additionally, when final regulations promulgated under the authority of OPA 90 are available, an additional review will be conducted.

Reviews of the plan will also be conducted any time that revised NVIC's are available, or when formally requested by the USCG or US EPA.

(f) Appendices

(1) Facility-specific information

escription of facility's principal characteristics

(i) Physical description of the facility, including a plan of the facility.

See Appendix H "Description and Plan View of Facility"

(ii) Identification of sizes, types and number of vessels that facility can transfer oil to, are presented in Appendix I "Types and Number of Vessels Serviced"

(iii) Identification of first valve separating MTR and non-MTR facility. See appendix H.

(iv) Description of material stored. See Appendix B "Product MSDS Sheets"

(A) Inclusion of generic or chemical name. See MSDS sheets.

(B) Description of appearance and odor. See MSDS sheets.

(C) Physical and Chemical characteristics. See MSDS sheets.

(D) Hazards involved in handling the oils. See MSDS sheets.

(E) List of fire fighting procedures. See MSDS sheets.

(v) Additional information provided. See MSDS sheets.

(2) List of contacts. See Appendix D facility Contact List.

(i) Primary and alternate qualified individuals. See Appendix D facility Contact List.

(ii) See Appendix A "Spill Response Contractor Information".

(iii) See Appendix C "Agency Contact List".

(3) Equipment lists and records

(i) See Appendix D Facility Contact List, and Appendix E Facility Equipment List.

(ii) List of major equipment provided by spill response organization

(iii) Description of equipment

(A) Type, make and model: See Appendix A, Spill Response Contractor Information.

(B) Effective daily recovery rate: See Appendix A, Spill Response Contractor Information.

(C) Containment boom, overall height, and type of end connectors. See Appendix A, Spill Response Contractor Information.

(D) The spill scenario in which the equipment will be used or for which it is contracted: All spill response contractor information is intended to be used for response to a worst case scenario.

(E) Total daily capacity for storage and disposal of recovered oil. In the event of a spill requiring the services of a spill response contractor, portable tankage of sufficient volume to hold the contents of a worst case spill, 126 barrels (5292 gallons) will be obtained. Depending on the location from which material is recovered, storage containers may be provided in the form of drums, frac tanks, tank trucks or vacuum trucks.

(4) Communications plan

See Appendix J, Communications Plan.

(5) Site-specific safety and health plan.
See Appendix K, Site-Specific Safety and Health Plan.

(6) List of acronyms and definitions

See Appendix K, List of Acronyms and Definitions

Geographical-specific appendix for mobile facilities (not applicable)

Section 9 Specific Guidelines for Facilities That May Cause Substantial Harm to the Environment

This Section is not applicable to this facility.

Section 10 Specific Response Information to be Maintained on Mobile MTR Facilities

The Egan Marine Corporation Loading Facility is not a mobile MTR facility. Therefore, this section is not applicable.

Section 11 Response Plan Development and Evaluation Criteria for Facilities That Handle, Store, or Transport Group I through Group IV Petroleum Oils

The Egan Marine Corporation Loading Facility handles Group V petroleum oils and non-petroleum oils only. Therefore, this section is not applicable.

Section 11.2 Response Plan Development and Evaluation Criteria for Facilities That Handle, Store, or Transport Group V Petroleum Oils

(a) Owner/operator should provide:

(1) Procedures and strategies for responding to discharges of group V petroleum oils

Oil Sheen or floating oil: See Section 8 of this plan.

Heavier-than-water material: Bulk shipments loaded and unloaded by this facility are typically heated asphaltic materials at temperatures in excess of 250 degrees F, with a specific gravity greater than 1.0. In the event of a spill into the canal, the material would be expected to cool rapidly, sink to the bottom, and solidify. Spreading of the material over a large area on the bottom of the canal, and away from the immediate area of the dock would not be expected, due to the rapid cooling, and increase in viscosity of the spilled asphaltic materials.

Location of the sub-surface material, and its perimeter, would utilize vessel-mounted sonar equipment. This equipment would be used throughout the removal process to verify complete removal.

The US Army Corp. of Engineers would be contacted to obtain an emergency dredging permit. The Corp. has been contacted regarding appropriate procedures to be followed in the event of a spill which would require dredging. Their permit department has stated that a permit would be required before any dredging could begin, including an emergency spill response. They did state that a permit application for dredging the residue of a spill would be expedited.

Removal from the bottom of the canal would be accomplished by a dredge.
The material would then be removed and placed in portable containers, such as roll-off boxes on shore. The recovered material will then be analyzed to determine if recycling was possible, or if disposal was required. Appropriate disposal permits would be applied for.

(2) Sources of the equipment and supplies

Mobile dredging equipment is available onsite at Egan Marine.

Roll-off boxes will be obtained from Waste Management.

(b) Owner should evaluate the limitations of equipment from;

(1) Ice conditions: Based on historical experience, it is not expected that ice would form in sufficient quantity or thickness to have an impact on removal operations. In the event that surface ice were to form in the immediate area of the spill in sufficient quantities or thickness so as to interfere with recovery operations, it would be broken up by one of the Egan Marine vessels.

(2) Debris: no debris would be anticipated to be present in the event of a sub-surface asphalt spill at the Egan Marine dock. Should any be encountered it would be easily removed via the dredge, and would not present an obstacle to the removal operation.

(3) Temperature ranges: Variation in surface or water temperatures would not be expected to materially effect the recovery operation.

(4) Weather-related visibility: Local visibility could be decreased due to the presence of fog. However, due to the expected close proximity of the dredge to the location of the spill, and the nearness to shore, adverse visibility would not be expected to materially effect the recovery operation.

(c) Identified equipment should include:

(1) Sonar, sampling equipment etc. for locating oil: Sonar will be used for locating the submerged material. This sonar is onsite at Egan Marine. If necessary, portable sonar ("fish-finder") units will be obtained and used from smaller vessel (John-boats), in order to locate the material. Because of the fact that the asphaltic material would quickly solidify after entering the water, typical sampling equipment would not be effective in determining the area of spread.

(2) Containment boom, methods for containing asphaltic oil: Containment boom would not be effective in containing the subsurface material. Because of the fact that the asphaltic material would quickly solidify after entering the water, additional containment would not be necessary or useful.

(3) Dredges, pumps for recovering oil: Because of the fact that the materials would quickly solidify after entering the water, pumps would not be effective in removing the material. Dredging equipment is identified in Appendix L Dredging Equipment.

(4) Equipment necessary to assess impact of discharges: No additional equipment is expected to be necessary to assess the impact of the discharge.

(5) Other appropriate equipment: No additional equipment is expected to be necessary to assess the impact of the discharge.

d) Responses must be deployable within 24 hours

The response sources identified in this plan are capable of responding within 24 hours of the discovery of a spill.

Identification of sources of firefighting capabilities:

Will County Police:	815-727-6191
Lemont Fire Department (7:30am-4:00pm)	708-257-2376
Lemont Fire Department (4:00pm-7:30am):	708-257-2221

Section 11.4 Response Plan Development and Evaluation Criteria for Facilities That Handle, Store, Transport non-Petroleum Oils

(a) Owner/operator should provide:

(1) Procedures and strategies for responding to discharges of nonpetroleum oils

Oil Sheen or floating oil: See Section 8 of this plan.

Bulk shipments loaded and unloaded by this facility are typically heated soybean/soapstock oil. In the event of a spill into the canal, the material would be expected to cool rapidly, and solidify. Spreading away from the immediate area of the dock would not be expected, due to the rapid cooling, and increase in viscosity of the spilled materials.

Removal from the canal would be accomplished by a hand scoops and dredge-type equipment. The material would then be removed and placed in portable containers, such as roll-off boxes or barrels on shore. The recovered material will then be recycled.

(2) Sources of the equipment and supplies

Equipment is available onsite at Egan Marine.

Roll-off boxes will be obtained from Waste Management.

(b) Owner should evaluate the limitations of equipment from;

(1) Ice conditions: Based on historical experience, it is not expected that ice would form in sufficient quantity or thickness to have an impact on removal operations. In the event that surface ice were to form in the immediate area of the spill in sufficient quantities or thickness so as to interfere with recovery operations, it would be broken up by one of the Egan Marine vessels.

(2) Debris: no debris would be anticipated to be present in the event of a sub-surface spill at the Egan Marine dock. Should any be encountered it would be easily removed via the dredge, and would not present an obstacle to the removal operation.

(3) Temperature ranges: Variation in surface or water temperatures would not be expected to materially effect the recovery operation.

4) Weather-related visibility: Local visibility could be decreased due to the presence of fog. However, due to the expected close proximity of the dredge to the location of the spill, and the nearness to shore, adverse visibility would not be expected to materially effect the recovery operation.

(c) Identified equipment should include:

(1) Containment boom, methods for containing soybean/soapstock oil: When dealing with soybean oil/soapstock, booms would be initially effective for containment. As the product cooled, it would solidify and would be scooped up effectively.

(2) Dredges, pumps for recovering oil: Because of the fact that the materials would quickly solidify after entering the water, pumps would not be effective in removing the material. Dredging equipment is identified in Appendix L Dredging Equipment.

(4) Equipment necessary to assess impact of discharges: No additional equipment is expected to be necessary to assess the impact of the discharge.

(5) Other appropriate equipment: No additional equipment is expected to be necessary to assess the impact of the discharge.

(d) Responses must be deployable within 24 hours

The response sources identified in this plan are capable of responding within 24 hours of the discovery of a spill.

Identification of sources of firefighting capabilities:

Will County Police:	815-727-6191
Lemont Fire Department (7:30 AM-4:00 PM)	708-257-2376
Lemont Fire Department (4:00 PM-7:30 PM):	708-257-2221

Section 12 Training

(a) Training must be identified: In addition to the on-the-job training of facility procedure and operations mentioned in section 8(e) of this plan, each person involved in the response structure will receive training as required by 29CFR1910.120, Hazardous Waste Operations and Emergency Response. Egan Marine Corp. will provide employee training consisting of 8 hr. of classroom training using a lecture format and visual aids plus a simulated emergency drill with active participation of all trainees at a minimum of one time per year. This training will be conducted at a pre-determined location by an individual trained and qualified to administer such training .

(b) Training records will be maintained for 3 years.

(c) This facility is not an oil spill response organization. Therefore, this section is not applicable.

(d) The facility owner will instruct their oil spill response organization to maintain adequate records.

Section 13 Drills

(a) Details of type and frequency of drills

(1) Facility and Qualified Individual notification drills will be conducted monthly.

(2) Facility equipment deployment drills will be conducted semi-annually.

(3) Spill management team tabletop drills will be conducted yearly.

(4) Egan Marine Corporation will conduct an annual unannounced drill. During this drill, the oil spill removal organization and spill management team will be activated. This drill will count as one of the semi-annual drills identified in (a)(2) above.

(5) Egan Marine Corporation will participate in any announced drill conducted by the cognizant COTP.

(6) Egan Marine Corporation will assure that the response resources identified in the plan participate in the annual deployment drill.

(b) Drills will be designated by the facility owner to either exercise a component or the plan or the entire spill plan. Once every three years, a drill will be conducted which exercises the entire plan.

(c) The facility owner will assure that drill records are maintained for three years.

(d) The facility owner will assure that drill records for the spill response contractor are maintained for three years.

(e) If the spill response contractor is drilled within the time periods specified, the owner will submit these records to the USCG as evidence of compliance with (a)(3) and (a)(5).

Section 14 Submission Procedures

In compliance with Section 14 of NVIC 7-92, two copies of this plan have been submitted to the COTP.

Copies of this plan will be maintained by the facility owner and operator, the qualified individual, and facility personnel.

Compliance with Submission Procedures

(a) Two copies were submitted to COTP.

(b) Egan Marine corporation understands that no plan will be approved until the final rules are in effect.

(c) Copies of the most current response plan submitted to the COTP will be maintained by facility wner/operator and qualified individual.

insert activation letter here

Appendix A Spill Response Contractor Information

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: National Industrial Maintenance, Inc.

COMPANY ADDRESS: 4530 Baring, East Chicago, IN 46312

PHONE NUMBERS: MAIN OFFICE: (219) 398-6660

Booms (type/size/skirt size/length!: 500 ft. 6' skirt.

Number of Skimmers (type/capacity in gallons per minute): Portable skimmer, 3 Floating 36' Saucer Skimmers, 5 Manta Ray Skimmers.

Number of Vacuum Trucks (capacity): 2 - 6500 gal; 3 - 3800 gal; 1 - 2500 gal; 1 - 1600 gal. Also 8 - 9000 gal Heavy oil vacuum loaders.

Boats (number, sizes. engine/horsepower): 2 - 16' boats 25 hp

Trailers (number/length/load capacity): 4 - 8000 gal tank trailers with pumps.

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: Clean Harbors.

COMPANY ADDRESS: 11800 S. Stony Island Avenue, Chicago, IL 60617

PHONE NUMBERS:	MAIN OFFICE:	(312) 646-6202
	24 HOUR:	Same

Number of Vacuum Trucks (capacity): 1 - 5000 gal; 1 - 3000 gal

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: Heritage Remediation/ Engineering
COMPANY ADDRESS: PO Box 337, Lemont, IL 60439
PHONE NUMBERS: MAIN OFFICE: (708) 739-1150
24 HOUR: Same

Booms type/size/skirt size/length): 1000 ft - 6' skirt, also 400 ft - 6" skirt in Indianapolis, IN.

Sorbent Boom: 800 ft of 8" boom (20 bales @ 40 ft/bale)

Sorbent (type): 3M absorbents - asorball, pads, snare, $5000 value in stock

Number of Skimmers (type/capacity in gallons per minute) 1 - Oil Mop 1000'

Number of Vacuum Trucks (capacity): 1 - 5000 gal, 1 - 5450 gal, 1 - 3500 gal, Also 1 - 3500 gal vac truck in Indianapolis, IN.

Communication Equipment (type and number: i.e. cellular phone. radio. etc.):
Radio Motorola-9, G.E. Walkie Talkies - 5 with earphones. Cellular phones G.E. - 8

Chemical Suits (number/type): Teflon fully encapsulated - 2, Saranes - 50, Responder - 4, Onemrel fully encapsulated - 50.

Self-Contained Breathing Apparatus (number/type): Scott - 4, SBA Scott - 12 w/egress, APR North/MSA Respirators - 25, 12 in other divisions.

Boats (number, sizes, engine/horsepower): 18' John Boat, 35 hp.
Work barges (number and size): None - Contractually available.

Aircraft (number and type): 1 - King Air prop. 8 passenger (based at Indianapolis)

Portable Generators (number/type/power output): 3-7 500 watt generator Koehler & Ingersoll Rand, 3 in other divisions.

Portable Pumps (number, type/capacity): 10 - 3" & 2" Double diaphragm air pumps, 200 to 300 gal/minute, 3 -3" trash pumps, 200 gal/minute, 15 in other divisions.

Trucks (number/horsepower/load capacity): 7 - 1 ton pickup utility trucks, 20 in other divisions, 7 - tractors Mack 300 hp, 500 pound capacity, 1 - lowboy, 50 ton.

Trailers (number/length/load capacity): 4 - Trailers tankers with Roper pumps, 6500 gal, 1 - box van 40', 1 - box van 22'

Other Equipment: Contact company for a list of other available equipment.

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: Torvac,Inc.

COMPANY ADDRESS: 3000 W. Wireton Road, Blue Island, IL 60406

PHONE NUMBERS:	MAIN OFFICE:	(708) 388-3223
	24 HOUR:	Same

Number of Vacuum Trucks (capacity): 3 - 3000 gallon with small water jet. Also 1 -Heavy oil vacuum loader (Vactor) with 3000 gallon capacity.

Trucks (number/horsepower/load capacity): 2 - 5000 gallon tankers.

Trailers (number/length/load capacity): 1 - semi trailer.

Other Equipment: 1 Vactor 1200 with 2000 psi water jet.

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: Marine Pollution Control

COMPANY ADDRESS: 8631 W. Jefferson, Detroit, MI 48209

PHONE NUMBERS: MAIN OFFICE: (313) 849-2333
24 HOUR: Same

Booms (type/size/skirt size/length): 1000 ft - 6" skirt flotation diameter 6". ACME "O.K Corral" boom. Boom distributor (truck load quantities are readily available).

Sorbent Boom: 3M or SPC 6000 ft of 8" boom (150 bales @ 40 ft/bale) and 5" boom (50 bales).

Sorbent (type): Rolls - 100, Pads - 200 bales, Pillows - 50 bales, Sweeps - 20 bales.

Number of Skimmers (type/capacity in gallons per minute): ACME Model SK-39T 300 gpm. Manta Ray Skimmer, 159 gpm. OSR Scavenger - for gasoline and #2 oil, 50 gpm.

Number of Vacuum Trucks (capacity): 1 - 6000 gal; 1 - 5000 gal; 1 - 3300 gal; 1 - 3000 gal; 1 - 2500 gal; 2 - 2000 gal; 1 - 1800- gal. Also 1 vacuum barge - 4000 gal.

Communication Equipment (type and number; i.e. cellular phone, radio, etc.): 5 Cellular phones, 1 - 2 way business band base station. 21 mobile 2 way business band radios. 8 portable 2 way radios. 5 marine radios. 6 mobile marine radios. 8 walkie-talkies.

Chemical Suits (number/type): 10 full air suits, protective clothing for level B & C. 4 MSA air packs. 2 MSA air cubs. 6 MSA cascade breathing systems. 35 MSA canister masks. 1 Wilson ambient air breathing systems.

Boats (number, sizes, engine/horsepower): 2 - 17' boom boats with marine radios and outboard motors. 6 - 12' john boats with outboard motors. 2 - 15' equipment rafts with outboard motors.

Work barges (number and size): BUDA I-36' x 12', capable of transport by air, rail or trailer, 200 hp outboard powered debris catcher, 12' x 20' debris or boom hauling space, marine radio.

Portable Pumps (number/type/capacity): 7 submersible hydraulically powered pumps. 8 complete systems containing a 6 cylinder air or water cooled diesel power pack. 200' cargo hoses. 300' hydraulic hoses and fuel bladder.

Other Equipment: Ground water decontamination equipment. 43 varieties of trucks and trailers.

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: Riedel Environmental Services, Inc.

COMPANY ADDRESS: Chicago Branch-65 E. Palatine Rd., Suite 109, Prospect Heights, IL 60070.
St. Louis Regional Office-18207 Edison Ave., Chesterfield, MO 63005

PHONE NUMBERS: CHICAGO OFFICE: (708) 215-0300
24 HOUR: (800) 334-0004

Sorbent Boom: 400 ft 8" boom (10 bales @ 40 ft/bale).

Sorbent (type): Grade 100 pads - 18" x 18" x 3/8" (100 pads/bale) SPC 100, 19#, 23 bales.

Number of Vacuum Trucks (capacity): Available from subcontractors.

Communication Equipment (type and number: i.e. cellular phone, radio, etc.): Motorola hand held radios and base stations (30) pickup truck mounted cellular telephones and response trailer mounted telephones (10).

Chemical Suits (number/type): PVC Acid suits (30) Acid King Level A Suits (8).

Self-Contained Breathing Apparatus (number/type): MSA Model 401 and Ultra-Lite (16).

Boats (number, sizes, engine/horsepower): 16' to 18' boats with 75/200 hp outboards, small boats with or without outboards.

Work barges (number and size): Available from subcontractor on short notice.

Portable Generators (number/type/power output): 3 kW (4), 5 kW (10), and 50 kW (1).

Trucks (number/horsepower/load capacity): Vans, Pickups, 1/2 & 3/4 ton. Four-wheel drive vehicles, 1 to 2-1/2 ton trucks, Crane truck.

Trailers (number/length/load capacity): Boom & Equipment, Office and Boom trailers.

Other Equipment: Contact company for other information.

POLLUTION CLEAN UP CONTRACTOR RESOURCES LIST

COMPANY NAME: O.H. Materials Corp.

COMPANY ADDRESS: 1334Enterprise Drive, Romeoville, IL 60441

PHONE NUMBERS:

MAIN OFFICE:	(800) 536-9540
24 HOUR:	(708) 759-9493

Number of Vacuum Trucks (capacity): 1 - 1500 gal.

Communication Equipment (type and number: i.e. cellular phone, radio, etc.): 1 mobile radio.

Boats (number, sizes, engine/horsepower): 2 motors, 2 john boats, 1 robalo boat.

Portable Pumps (number/type/capacity): 1 electric chemical transfer pump, 6 - 1 1/2" high pressure pumps, 3" electric submersible pump.

Trucks (number/horsepower/load capacity): 1 - 2 ton PCT truck.

Trailers (number/length/load capacity): 1 decon/office trailer (28')

Other Equipment: 3 chain saws, 1 dissolved oxygen meter, 2 explosion meters, 1 flow meter, 1 fork lift, misc. lab equipment, 1 partner saw, 1 pH meter, 1 - 535,000 BTUs burner.

Appendix C Agency Contact List

Federal, State and Local Agencies

National Spill Response Center:	800-424-8800
Coast Guard MSO (7:30 AM to 4:00 PM):	708-789-5830
Coast Guard Milwaukee (4:00 PM-7:30 AM):	414-747-7190
Illinois EPA:	708-345-9780
Will County Police:	815-727-6191
Lemont Fire Department (7:30 AM-4:00 PM):	708-257-2376
Lemont Fire Department (4:00 PM-7:30 AM):	708-257-2221

Appendix D Facility Contact List

EGAN MARINE CORPORATION: 708-739-0947

EGAN MARINE CORPORATION FAX: 708-739-4455

Egan Marine's President is Dennis Egan, address Bluff Road, Lemont, IL 60439, phone 708-972-0948.

Egan Marine's vice-president is Robin Chanda, address 1446 Star Lane, Lemont, IL 60439, phone 815-838-6660.

Egan Marine's designated responsible and qualified person is Dennis Egan. Information above.

Facility Equipment List

Absorbent material will be stored on site for small spills on dock or barge. This includes individual 200 count 16.5 x 20" absorbent pads, each capable of 32 oz. of absorption, or 25 gallons per bale, and four (4) 8" x 10' sections of absorbent boom, for immediate containment of any spillage into canal.

Appendix F Site Specific Health and Safety Plan

Site Specific Health and Safety Plan

I Protective Equipment

Gloves will be used to handle hot material. Additional protective clothing, such as coveralls will be provided if a safety related situation warrants. Hard-hats and safety glasses will be issued to personnel.

II Communication Procedure

Communications will be handled as described elsewhere in this document.

III Location of Safety Equipment

Safety equipment is located inside the dock shed. This equipment includes 2 ABC fire extinguishers, a first-aid kit and life rings.

IV First Aid Treatment

Decisions involving the application of first aid treatment to any injured employee or visitor to the facility will be made by the ranking Egan Marine Corporation employee on site, or by any public safety/security official who has formally assumed the responsibility for safety related activities at this site in the event of a spill or public safety emergency.

The person identified above shall determine if first aid is sufficient, or if more advanced professional care is required. If more advanced medical care is required, the injured person will be transported to Silver Cross Hospital in Joliet, (815) 740-1100, for additional medical treatment.

V Safety Training

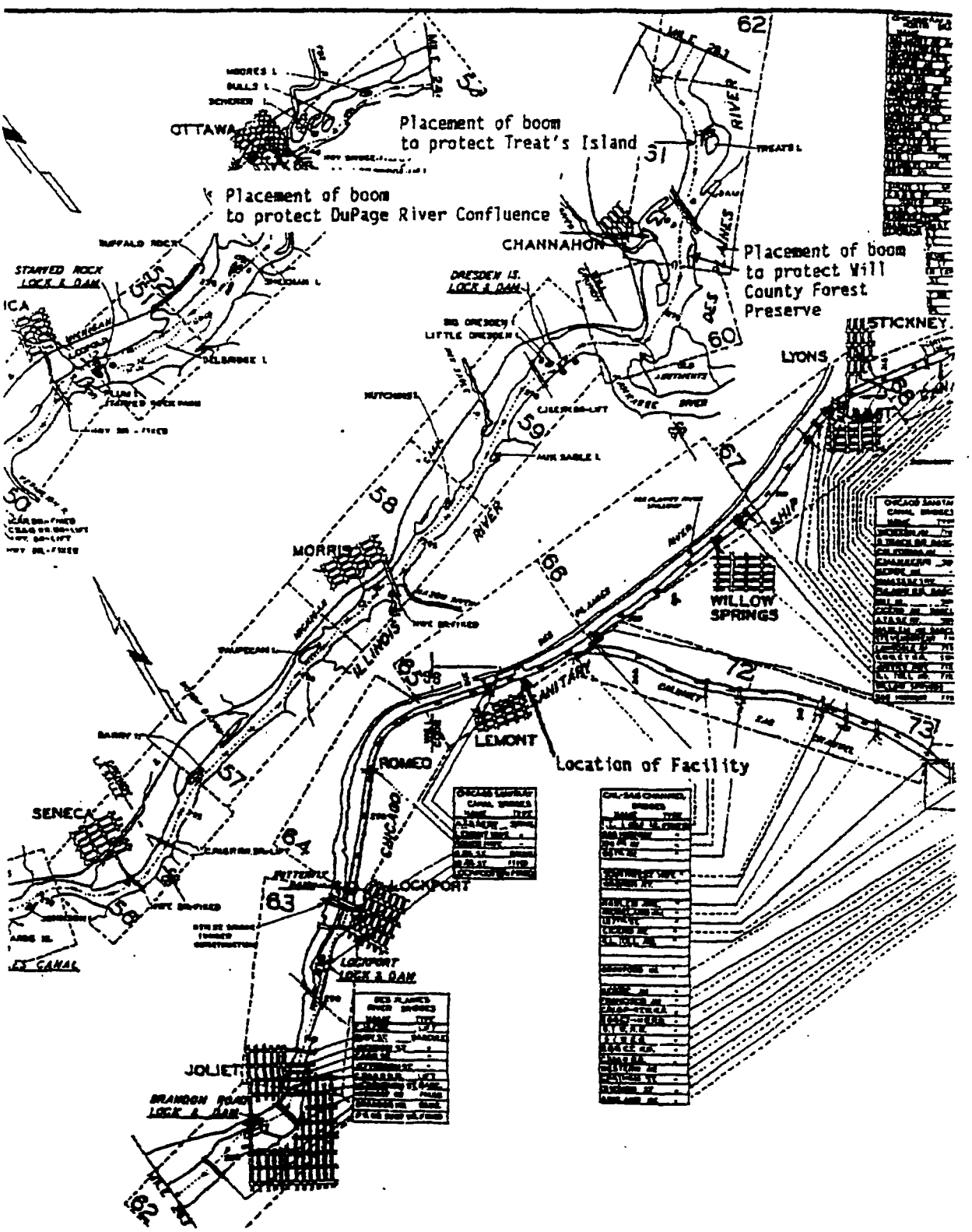
All employees will be required to read the Material Safety Data Sheets for the materials handled at this facility. Visitors will be instructed as to safety procedures they must follow while on site.

VI Fire Fighting

Fire emergencies will be addressed by using on-site fire extinguishers, if the fire is relatively small. The Lemont Fire Department will be called, as described elsewhere in this plan, if there is any doubt as to the ability of facility personnel to contain and extinguish any fire.

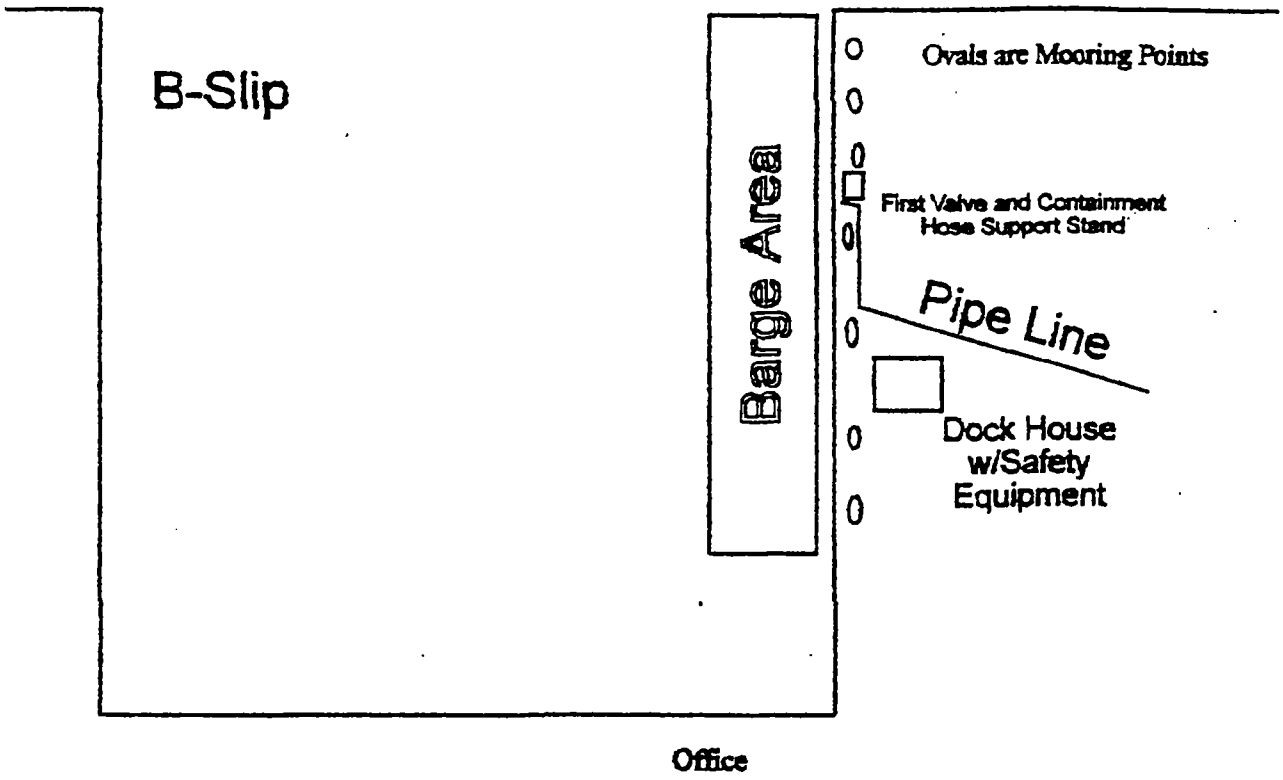
This plan will be in effect for any location involved in a response to a spill from this location.

Appendix G Map Identifying Environmentally Sensitive Areas


Placement of boom
to protect Treat's Island
Placement of boom
to protect DuPage River Confluence
Placement of boom
to protect Will
County Forest
Preserve
Location of Facility
OTTAWA
CHANNAHON
STICKNEY
LYONS
MORRIS
WILLOW
SPRINGS
LEMONT
ROMEO
SENECA
LOCKPORT
JOLIET
STARVED ROCK
LOCK & DAM
DRESDEN IS.
LOCK & DAM
LOCKPORT
LOCK & DAM
BRANDON ROAD
LOCK & DAM
ILLINOIS
RIVER
DES PLAINES
RIVER
CHICAGO
SANITARY
SHIP
CANAL

Appendix H Description and Plan View of Facility

Chicago Sanitary and Ship Canal



Appendix I Types and Number of Vessels Serviced

Sizes; Types; and Numbers of Vessels:

Individual tank barges will range in size from 7,500 barrels to 15,000 barrels. Individual shipments would involve a minimum volume of 7,500 barrels (one barge), and a maximum volume of 45,000 barrels (3 barges). 90% of Egan Marine's incoming shipments are either a 7,500 or 15,000 barrel barge. This facility can load or unload 2 barges at one time.

Appendix J Communication Plan

The primary method of communication between the dock and barge will be Motorola 2-way radios. In the event of a spill, the same radios can be used to contact the rest of the facility and office. Egan Marine's designated qualified person, and alternate qualified person, carry this type of radio during the normal course of work.

3(a) Introduction and plan content

(3) Egan Marine's designated responsible and qualified person is Dennis Egan, address Bluff Road, Lemont, IL. 60439, phone 708-972-0948. Mobile telephone number: 708-975-6900.

The procedure for contacting the owner or operator is as follows:

During all times that transfers are in progress, an Egan Marine employee will be present as operator. Therefore, notification of any spill will be nearly instantaneous. Additionally, the operator is in constant radio communication with the barge. In the event of a spill, the operator will immediately contact Egan Marine's designated qualified person, or his replacement by telephone.

8(b) Emergency response action plan

(1) Notification procedures

(I) Prioritized identification of person(s) to be notified in the event of a discharge or substantial threat of a discharge of oil.

(A) Facility Response Personnel

In the event of any spill emergency, the Egan Marine Corporation operator on duty shall do the following:

Immediately notify the barge operator to shut the barge's pumps off, and close the pump discharge valving (unloading operations).

Immediately shut off his transfer pump and close the pump discharge valving (loading operations).

If the spill occurs during barge unloading operation, the operator will place the following call after closing the shut off valve:

Contact Dennis Egan, (708) 972-0948 (home), as primary qualified person. If he is not available contact Daniel Egan (708) 972-1116 (home).

Dennis Egan, or Daniel Egan, if Dennis Egan is unavailable, will make the following contacts:

Heritage Environmental, the designated oil spill response organization (OSRO). Emergency number 708-378-1600

(B) Federal, state and local agencies

National Spill Response Center:	800-424-8800
Coast Guard MSO (7:00 AM to 3:30 PM):	708-789-5830
Coast Guard Milwaukee (3:30 PM-7:00 AM):	414-747-7181
Illinois EPA:	708-345-9780
Will County Police:	815-727-6191
Lemont Fire Department (7:3O AM-4:00 PM)	708-257-2376
Lemont Fire Department (4:00 PM-7:30 AM):	708-257-2221

The communications plan for this facility is presented in Sections 8(a)(3) and 8(b)(1).

Except as otherwise defined in this section, the definitions in 33 CFR 154.105 are also relevant to this Appendix.

Adverse weather means the weather conditions that will be considered when identifying response systems and equipment is a response plan for the applicable operating environment. Factors to consider include significant wave height, ice, temperature, weather-related visibility, and currents within the Captain of the Port (COTP) zone in which the systems or equipment are intended to function.

Average most probable discharge means a discharge of the lesser of 50 barrels or 1 percent of the volume of the worst case discharge.

Captain of the Port Zone (COTP) means a zone specified in 33 CFR part 3 and the seaward extension of that zone to the outer boundary of the exclusive economic zone (EEZ).

Contract or other approved means includes--

(1) A written contractual agreement with a response contractor. The agreement should identify and ensure the availability of the specified personnel and equipment described under this NVIC within stipulated response times in the specified geographic areas;

(2) Certification by the facility owner or operator that the specified personnel and equipment described under this NVIC are owned, operated, or under the direct control of the facility owner or operator, and are available within stipulated times in the specified geographic areas;

(3) Active membership in a local or regional oil spill removal organization that has identified specified personnel and equipment described under this NVIC that are available to respond to a discharge within stipulated times in the specified geographic areas;

(4) A document which--

(i) Identifies the personnel, equipment, services, capable of being provided by the response contractor within stipulated response times in specified geographic areas;

(ii) Sets out the parties' acknowledgment that the response contractor intends to commit the resources in the event of a response;

(iii) Permits the Coast Guard to verify the availability of the response resources identified through tests, inspections, and drills; and

(iv) Is incorporated by reference in the response plan; or

(5) For a facility that could reasonably be expected to cause substantial harm to the environment, with the consent of the response contractor or oil spill removal organization, the identification of a response contractor or oil spill removal organization with specified equipment and personnel which are available within stipulated response times in specific geographic areas.

Exclusive economic zone means the zone contiguous to the territorial sea of the United States extending to a distance up to 200 nautical miles from the baseline from which the breadth of the territorial sea is measured.

Facility that could reasonably be expected to cause significant and substantial harm means any fixed MTR onshore facility (including piping and any structures that are used for the transfer of oil between a vessel and a facility) that is capable of transferring oil, in bulk, to or from a vessel of 250 barrels or more, and a deepwater port. This also includes any facility specifically identified by the COTP under Section 3.

Facility that could reasonably be expected to cause substantial harm means any mobile MTR facility that is capable of transferring oil to or from a vessel with a capacity of 250 barrels or more. This also includes any facility specifically identified by the COTP under Section 3 of this Appendix.

Great Lakes means Lakes Superior, Michigan, Huron, Erie, and Ontario, their connecting and tributary waters, the Saint Lawrence River as far as Saint Regis, and adjacent port areas.

Higher volume port area means the ports of:

(1) Boston, MA.

(2) New York, NY.

(3) Delaware Bay and River to Philadelphia, PA.

(4) St. Croix, VI.

(5) Pascagoula, MS.

(6) Mississippi River from Southwest Pass, LA. to Baton Rouge, LA.

(7) Louisiana Offshore Oil Port (LOOP), LA.

(8) Lake Charles, LA.

(9) Sabine-Neches River, TX.

(10) Galveston Bay and Houston Ship Channel, TX.

(11) Corpus Christi, TX.

(12) Los Angeles/Long Beach Harbor, CA.

(13) San Francisco Bay, San Pablo Bay, Carquinez Strait, and Suisun Bay to Antioch, CA.

(14) Straits of Juan De Fuca and Puget Sound, WA.

(15) Prince William Sound, AK.

Inland area means the area shoreward of the boundary lines defined in 46 CFR part 7, except in the Gulf of Mexico. In the Gulf of Mexico, it means the area shoreward of the lines of demarcation (COLREG lines) defined in §§ 80.740 - 80.850 of title 33 of the CFR. The inland area does not include the Great Lakes.

Marine transportation-related facility (MTR facility) means an onshore facility, including piping and any structure used to transfer oil to or from a vessel, subject to regulation under 33 CFR Part 154 and any deepwater port subject to regulation under 33 CFR part 150.

Maximum extent practicable means the planning values derived from the planning criteria used to evaluated the response resources described in the response plan to provide the on-water recovery capability and the shoreline protection and cleanup capability to conduct response activities for a worst case discharge from a facility in adverse weather.

Maximum most probable discharge means a discharge of the lesser of 1,200 barrels or 10 percent of the volume of a worst case discharge.

Nearshore area means the area extending seaward 12 miles from the boundary lines defined in 46 CFR part 7, except in the Gulf of Mexico. In the Gulf of Mexico, it means the area extending seaward 12 miles from the line of demarcation (COLREG lines) defined in §§ 80.740 - 80.850 of title 33 of the CFR.

Non-persistent or Group I oil means a petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions–

(1) At least 50% of which by volume, distill at a temperature of 340 degrees C (645 degrees F); and

(2) At least 95% of which by volume, distill et a temperature of 370 degrees C (700 degrees F).

Non-petroleum oil means oil of any kind that is not petroleum-based. It includes, but is not limited to, animal and vegetable oils.

Ocean means the offshore area and nearshore area as defined in this Appendix.

Offshore area means the area beyond 12 nautical miles measured from the boundary lines defined in 46 CFR part 7 extending seaward to 50 nautical miles, except in the Gulf of Mexico. In the Gulf of Mexico it is the area beyond 12 nautical miles of the line of demarcation (COLREG lines) defined in §§ 80.740 - 80.850 of title 33 of the CFR extending seaward to 50 nautical miles.

Oil spill removal organization means an entity that provides response resources.

Operating area refers to the Rivers and canals, Inland, Nearshore, Great Lakes, or Offshore geographic location(s) in which a facility is handling, storing, or transporting oil.

Operating environment refers to Rivers and canals, Inland, Great Lakes, or Ocean. These terms are used to define the conditions in which response equipment is designed to function.

Persistent oil means a petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of this Appendix, persistent oils are further classified based on specific gravity as follows:

(1) Group II - specific gravity less than .85.

(2) Group III - specific gravity between .85 and less than .95.

(3) Group IV - specific gravity .95 to and including 1.0

(4) Group V - specific gravity greater than 1.0.

Qualified individual(s) means an English-speaking representative(s) of the facility identified in the plan, located in the United States, available on a 24-hour basis, familiar with implementation of the facility response plan, and trained in his or her responsibilities under the plan.

This person must have full written authority to implement the facility's response plan. This includes--

(1) Activating and engaging in contracting with identified oil spill removal organization(s);

(2) Acting as a liaison with the predesignated Federal On-Scene Coordinator (OSC); and

(3) Obligating, either directly or through prearranged contracts, funds required to carry out all necessary or directed response activities.

Response activities means the containment and removal of oil from the water and shorelines, the temporary storage and disposal of recovered oil, or the taking of other actions as necessary to minimize or mitigate damage to the environment.

Response resources means the personnel, equipment, supplies, and other capability necessary to perform the response activities identified in a response plan.

Rivers and canals means a body of water confined within the inland area that has a project depth of 12 feet or less, including the Intracoastal Waterway and other waterways artificially created for navigation.

Spill management team means the personnel identified to staff the organizational structure identified in a response plan to manage response plan implementation.

Substantial threat of a discharge means any incident or condition involving a facility that may create a risk of discharge of fuel or cargo oil. Such incidents include, but are not limited to storage tank or piping failures, above ground or underground leaks, fires, explosions, flooding, spills contained within the facility, or other similar occurrences.

Worst case discharge means

(a) For facilities with above ground storage, not less than--

(1) loss of the entire capacity of all tank(s)at the facility not having secondary containment; plus

(2) loss of the entire capacity of any single tank within a secondary containment system or the combined capacity of the largest group of tanks within the same secondary containment system, whichever is greater; and

(b) For facilities with below ground storage supplying oil to or receiving oil from the MTR portion, means the cumulative volume of all piping carrying oil between the marine transfer manifold and the non-transportation related portion of the facility. The discharge of each pipe is calculated as follows: the maximum time to discover the release from the pipe in hours, plus the maximum time to shut down flow from the pipe in hours (based on historic discharge data or the best estimate in the absence of historic discharge data for the facility) multiplied by the maximum flow rate expressed in barrels per hour (based on the maximum daily capacity of the pipe) plus the total line drainage volume expressed in barrels for the pipes between the marine manifold and the non-transportation-related portion of the facility.

(c) For a mobile facility it means the loss of the entire contents of the container in which the oil is stored or transported.

Section 6 Operating restrictions and interim operating authorization.

(a) The owner or operator of each MTR facility to which this Appendix may be applied should submit a response plan meeting the guidelines of Sections 7, 8, 9, or 10 as appropriate, and Sections 11, 11.2, or 11.4, as appropriate of this Appendix. An MTR facility that is required to prepare a response plan under section 311(J)(5) of the FWPCA may not handle, store, or transport oil after February 18, 1993 unless a response plan has been submitted to the COTP.

(b) After August 18, 1993, no MTR facility subject to section 311(j)(5) of the FWPCA may handle, store, or transport oil unless operating in full compliance with a submitted response plan.

(c) In the absence of a significant difference between this NVIC and the final rule, each facility response plan determined by the COTP to meet the guidelines of this NVIC need not be resubmitted to the COTP when the final rule becomes effective. A response plan determined by the COTP to meet the guidelines of this NVIC will be accepted for 5 years or until a significant change occurs at the facility, as defined in the final rule.

Appendix L Dredging Equipment

The following equipment is available at Egan Marine, Lemont, IL, in the event of a Group V oil spill at the Egan Marine Corporation facility:

30' x 120' Deck Barge, #101

195' x 35' Open Hopper Barge, MEM #394

Link Belt Crane, Lima 7035C with 2 buckets (1 or 2 cubic yards)

ATTACHMENT 5:

EMC Mobile Facility Emergency Response Plan

Egan Marine Corporation

Mobile Facility Emergency Response Plan

July 25, 1994

Table of Contents

TRAINING PROCEDURES

DRILL PROCEDURES

PLAN REVIEW AND UPDATE PROCEDURES

GEOGRAPHIC INFORMATION

VESSEL-SPECIFIC INFORMATION

RECORD OF CHANGES

Revision No.

Date:

Date: **Approved by:**

I, Dennis Egan, hereby certify that this plan meets the applicable guidelines.

_____

Dennis Egan
President
Egan Marine Corporation

AREAS OF OPERATION

COTP ZONES:

Chicago
Detroit
Duluth
Milwaukee
Sault Ste. Marie
Toledo
Grand Haven

NOTIFICATION CHECKLIST

This checklist and all emergency procedures are to be kept at the transfer site.

The following notifications must be made, if the vessel has an oil spill, substantial threat of an oil spill, fire, explosion, grounding, collision, or any other incidence which threatens the safety of the vessel, its compliment and surroundings:

☐	U.S. Coast Guard National Response Center	or	1-800-424-8802 1-202-267-2675
☐	Egan Marine Corporation		708-739-0947
☐	Qualified Person Dennis Egan		708-972-0948
☐	Heritage Remediation - Chicago Div. Nation-Wide		708-378-1600 1-800-487-7466

Procedures for Notifying the Qualified Individual

Qualified Individual Dennis Egan can be notified by one of the following methods on a 24 hour on-call basis:

Home	708-972-0948
Car	708-975-6900
Pager	708-659-6900

Also, contact with EMC office 708-739-0947 is required to facilitate communications to Dennis Egan.

The following notifications must be made, if the vessel has an oil spill, substantial threat of an oil spill, fire, explosion, grounding, collision, or any other incidence which threatens the safety of the vessel, its compliment and surroundings:

Whom To Notify:	Made By:
U.S. Coast Guard National Response Center Phone: 1-800-424-8802 Or: 1-202-267-2675	Master {Within 30 Minutes}
Egan Marine Corporation PO Box 669 Lemont, Illinois 60441 Bus Phone: 708-739-0947 Home Phone: 708-972-0948 Home Phone: 708-972-1116	Master
Dennis H. Egan Home: {708} 972-0947 Page: {708} 659-6900 Car : {708} 975-6900	Master
Daniel T. Egan {Alternate #1} Home: {708} 972-1116 Page: {708} 659-6907 Car : {708} 975-6917	Master
Barre Nall {Alternate #2} Home: {815} 722-8516 Page: {708} 659-6908 Car : {708} 975-6908	Master
Robin K. Chanda {Alternate #3} Home: {815} 838-6660 Page: {708} 659-6904 Car : {708} 975-6904	Master
Local Requirements	Master or Qualified Individual
Oil Spill Resources	Master or Qualified Individual {Within 30 Minutes}
Response Management Team	Qualified Individual

NOTIFICATION PROCEDURES
{Spill or Potential Spill}

1. Personnel checklist in order of contact priority:

   A. Dennis H. Egan
   B. Daniel T. Egan
   C. Barre Nall
   D. Robin K. Chanda

2. Shore personnel shall:

   A. Notify EMC Office
   B. Notify qualified individual

3. EMC Office or qualified individual shall notify:

   A. U.S. Coast Guard Emergency Response Center
   B. OSRO if deemed necessary

4. Notification shall be made by:

   A. Cellular phone.
   B. Land line phone if available.
   C. Marine radio.

5. The following information should be included in all notifications:

   A. Vessel name.
   B. Tank barge name, country of register, and official number.
   C. Time of incident.
   D. Location of incident.
   E. Type of hazardous material involved.
   F. Nature of incident {e.g., grounding, collision, etc...}
   G. Estimate of hazardous material discharged or threat of discharge.
   H. Weather conditions on scene.
   I. Action taken and action to be taken by persons on the scene.
   J. Injuries and/or fatalities.

NOTIFICATION REQUIREMENTS

Accident Reports

The initial report must reach the following within 30 minutes of the discovery of any discharge:

1. U.S. Coast Guard - National Response Center
2. Qualified Individual
3. Contracted Clean-Up Resources
4. Owner
5. Any local state requirements as per Chapter

It is extremely important for the initial report to contain an estimate of spilt volume, to determine call-out of resources, i.e.:

a. less than 50 barrels {average most probable spill};
b. more than 50 barrels but less than 1,000 barrels {maximum most probable spill}; or
c. more than 1,000 barrels, with an indication of actual or potential size of spill.

REPORTING FORMAT

All reporting shall follow IMO's reporting format as outlined below. The report shall be made in writing, if possible. If a verbal report is made, make sure that the name {and rank} of person receiving report is logged.

Reporting Format:

Label	Function	Explanation
Name	Addressee	To whom the message should be delivered.
MP	Type of Report	Marine Pollution Report.
Other		Any Other Report.
A	Vessel	Name and nationality.
B	Date and Time	A 6-digit group giving day of month {first two of Event digits}, hours and minutes {last four digits}, plus time zone used.
C	Position	River mile point or a 4-digit group giving latitude in degrees and minutes suffixed with N or S, and a 5-digit group giving longitude in degrees and minutes suffixed with E or W.
D	Position	True bearing {first 3 digits} and distance {state distance} in nautical miles from clearly identified landmark {state land-mark}.
M	Radio Communications	State in full names of stations and frequencies guarded.
N	Time of Next Report	Date/time group expressed as in {B}.
O	Maximum Present Draft in Feet	Draft of vessel in feet and inches.
P	Cargo On Board	Correct technical name of goods. UN number. IMO hazard class. Name of consignee or consignor. Quantity and condition of cargo. Note: can be included in {r} as relevant.

REPORTING FORMAT {Continued...}

Label	Function	Explanation
Q	Defects, Damage Deficiencies Other Limitations	Condition of vessel as relevant. Ability to transfer cargo, ballast, and fuel.
R	Description of Pollution or Possible Overboard Discharge	Correct technical name of cargo. UN number. IMO hazard class. Name of consignee or consignor. Total quantity on board, and quantity lost. Whether loss is continuing. Movement information of lost cargo. Cause of loss.
S	Weather Conditions	Brief details of weather and sea conditions prevailing.
T	Ship's Representative and/or Owner	Name and number for vessel's Qualified Individual and full name, address, and number for owner, operator, manager or charterer.
X	Miscellaneous	Action being taken with regards to the discharge and movement of the ship. Assistance or response which have been requested or which have been provided by others. Any other vessels involved. If the report is made from an assisting vessel, state action planned.

DEFINITION OF SPILL VOLUMES

For planning purposes, the following volumes are used based on OPA 90 regulations:

Average Most Probable:	50 Barrels
Maximum Most Probable:	1,000 Barrels
Worst Case Discharge:	Group 1 Oil: 10,000 Barrels Group 2 Oil: 10,000 Barrels Group 3 Oil: 10,000 Barrels Group 4 Oil: 10,000 Barrels Group 5 Oil: 10,000 Barrels

WORST CASE DISCHARGE
NON-PERSISTENT OIL
{OPA GROUP 1}

Definition:

Non-persistent or Group 1 oil means a petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions:

{ i} At least 50% of which by volume, distills at a temperature of 340 degrees Celsius; and

{ii} At least 95% of which by volume, distills at a temperature of 370 degrees Celsius.

WORST CASE DISCHARGE
PERSISTENT OIL
{OPA GROUP 2}

Definition:

Persisten oil Group 2 means:

A petroleum-based oil that does not meet the distillation criteria for non-persistent oil {Group 1}, and has a specific gravity less than 0.85.

RE: Service Welding & Ship Building
NE Canal Bank Road, Lemont, Illinois
RESPONSE TO USEPA 8/11/2000 CORRESPONDENCE

Service Welding & Ship Building, has revised their SPCC Plan due to changes made in the operation of the bulk storage plant. Below is an outline identifying the responses to each of the alleged deficiencies noted under Attachment A of above referenced USEPA correspondence.

1. ***For Failure to Review SPCC Plan at least Every Three Years:*** *An SPCC Plan which indicates the date on which a review of the Plan was conducted, along with the signature and title of an authorized official of the facility, if an amendment to the SPCC Plan is unnecessary. An amendment is necessary whenever there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shore lines. If an amendment to the SPCC Plan is necessary, the required changes must be made, certified by a Professional Engineer and the amended SPCC Plan must be submitted along with the date of review, and the signature and title of an authorized official of the facility.*

   **Please have Plan Reviewed*.*

   Based upon a re-evaluation of the facility and changes made to the operation over the past few years, the facility's SPCC Plan has been revised, reviewed and re-certified by a Professional Engineer.

2. ***40 CFR 112.3 - Requirements for preparation and implementation of Spill Prevention Control and Countermeasure Plans.***

   Failure to prepare a plan within 6-months after facility became operational and implement same plan within one year after facility became operational.

   Egan Marine had developed an SPCC Plan back in 1995 and made improvements to the facility to ensure controls of spills and releases from the bulk plant operations. The plant now has been down-sized and ultimately will only cover the four bulk (boiler) fuel storage tanks proposed to remain in operation. The SPCC requirements remain in effect as designated by the revised SPCC Plan enclosed herein. Service Welding and Ship Building contends that due to the topography of the facility that a release of materials from the bulk storage operations would not reach the Chicago Sanitary & Ship Canal and the SPCC plan and structures installed only assist to minimize this potential. Furthermore, due to the coincident operation of the Egan Marine Corporation barge terminal at the same location which has an approved Coast Guard Facility Response and Mobile Facility Response Plan(s), the expertise to respond to a release from the bulk storage operations has always been in place at the facility.

3. *40 CFR 112.7 - Guidelines for the preparation and implementation of a Spill Prevention Control and Countermeasure Plan*

RE: Service Welding & Ship Building
NE Canal Bank Road, Lemont, Illinois
RESPONSE TO USEPA 8/11/2000 CORRESPONDENCE

OK

(e)(2) Failure to provide complete discussions and/or implement requirements pertaining to Bulk Storage Tanks

Tank material/construction is not compatible with fluid stored.

Page 14, Not Specified in Plan in Detail.

As specified in the reviewed plan and the revised plan herein, the tanks to remaining in operation are constructed of mild steel, which is compatible with the materials stored, petroleum and vegetable-based by-product.

NO

4. *Failure to provide secondary containment for the largest single tank plus an allowance for precipitation. #104, 105, 115, 120, 124, 128*

**Page 3, III, Not specified in Plan in Detail. Please provide secondary containment*.*

The secondary containment calculations for each storage area for the tanks to remain in operation (B-1 through B-4, in addition to the temporary soapstock storage tanks to be taken out of operation at such time a market for the product is secured) have been revised to allow for precipitation. Refer to pages 3-4 of the enclosed revised SPCC Plan. All of the remaining tanks have been emptied.

5. *Failure to either wrap or coat new buried metallic storage tanks to reduce corrosion (or other effective method compatible with local soil conditions)*

OK

Failure to pressure test such tanks on a regularly scheduled basis.

Not Stated in Plan

The SPCC Plan has been revised to indicate that there are no buried metallic tanks located on-site. Refer to page 16 of the revised SPCC Plan.

OK

6. *Failure to adequately coat the buried section of a partially buried metallic tank.*

Not Stated in Plan

The SPCC Plan has been revised to indicate that there are no buried metallic tanks located on-site. Refer to page 16 of the revised SPCC Plan.

OK

7. *Failure to control internal heating coil leakage by:*

1. Monitoring the stream return or exhaust lines for oil or passing the steam lines through a separation system.

2. Installing external heating system.

Not Stated in Plan

RE: Service Welding & Ship Building
NE Canal Bank Road, Lemont, Illinois
RESPONSE TO USEPA 8/11/2000 CORRESPONDENCE

The SPCC Plan has been revised to indicate that the discharge from the internal steam lines will be inspected for purposes of monitoring for leakage. Refer to page 16.

8. *To implement fail-safe engineering techniques on the tanks with one of the following: #103, 108, 119.*

Not Stated in Plan

1. *High liquid level alarms with an audible or visual signal;*
2. *High liquid level pump cutoff devices;*
3. *Direct audible or code signal between the tank gauge and pumping station;*
4. *A fast response system to detect oil level such as digital computers;*
5. *Sensing devices should be inspected/tested periodically.*

The requirements for automated liquid level monitoring equipment is only required as practical. Due to the fact that the amount of tanks to remain in use has been minimized to four boiler fuel tanks and three vehicle fuel tanks, Service Welding has alternately implemented continuously monitoring of transfer operations by means of visual inspection to prohibit overfills. Refer to page 16 of the revised SPCC Plan.

9. *(e)(3) Failure to provide complete discussions and/or implement requirements pertaining to Facility Transfer Operations.*

Failure to wrap/coat buried pipelines to reduce corrosion.

Not Stated in Plan

The SPCC Plan has been revised to indicate that there are no buried pipelines at the facility. Refer to page 17 of the revised SPCC Plan.

10. *Failure to cap or blank flange the terminal connection at the transfer point of a pipeline when not in service or on standby for an extended time.*

Not Stated in Plan

There is no "hard" pipelines in operation at the plant. Refer to page 17 of the revised SPCC Plan.

11. *Failure to provide pipe supports which are designed to minimize abrasion and corrosion and allow for expansion and contraction.*

Not Stated in Plan

The existing overhead piping in operation at the facility is comprised of steam lines only. The overhead product piping is no longer in use and has been abandoned. Refer to page 17 of the revised SPCC Plan.

RE: Service Welding & Ship Building
NE Canal Bank Road, Lemont, Illinois
RESPONSE TO USEPA 8/11/2000 CORRESPONDENCE

12. *Failure to regularly assess all above ground valves and pipelines by operating personnel.*

Not Stated in Plan

There is no active product piping in use at the plant. Refer to page 17 of the revised SPCC Plan.

13. *Failure to warn large vehicles verbally or by appropriate signs to be cautious of aboveground piping.*

Not Stated in Plan

There is no active product piping in used at the plant. Refer to page 17 of the revised SPCC Plan.

14. *(e)(4) Failure to provide complete discussions and/or implement requirements pertaining to Facility Tank Truck Loading/Unloading Rack.*

(i) Failure to meet the minimum requirements and regulations established by the Department of Transportation regarding tank car and tank truck loading and unloading procedures.

**Not Stated in Plan*.*

The SPCC Plan has been revised to address this item. Refer to page 17 of the revised SPCC Plan.

15. *Failure to provide a quick drainage system with a containment volume greater than the largest compartment of any tank car or truck where drainage does not flow into a catchment basin or a treatment facility.*

The SPCC Plan has been revised to address this item. Refer to page 18 of the revised SPCC Plan.

16. *Failure to provide an interlocked warning light or physical barrier system or warning sign in loading/unloading areas to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines.*

Not Stated in Plan

The SPCC Plan has been revised to address this item by the usage of tire chocks to prevent premature departure. Refer to page 18 of the revised SPCC Plan.

17. *Failure to inspect drains and outlets on tank cars and tank trucks are inspected for leakage prior to filling and departure.*

**Not Stated in Plan*.*

RE: Service Welding & Ship Building
NE Canal Bank Road, Lemont, Illinois
RESPONSE TO USEPA 8/11/2000 CORRESPONDENCE

The SPCC Plan has been revised to address this item. Refer to page 18 of the revised SPCC Plan.

18. *(e)(8) Failure to include written procedures for required inspection and records of same inspections in the SPCC Plan for a period of three years.*

**Not Stated in Plan*.*

The SPCC Plan has been revised to include the retention of the outlined inspection procedures for a period of three years. Refer to page 18 of the revised SPCC Plan.

19. *(e)(9) Security (excluding oil production facilities)*

Failure to securely lock master flow and drain valves in the closed position or any other valves that will permit direct outward flow of the tanks contents to the surface when in non-operating or non-standby status.

**Not Stated in Plan*.*

The SPCC has been revised to include the inspection of drain valves on a daily basis to ensure that they are in the off position. All transfer operations personnel are trained to ensure that they close all drain valves following product transfers. Refer to page 19 of the revised SPCC Plan.

20. *Failure to lock in the off position or make accessible only to authorized personnel starter controls on all oil pumps in a non-operating or non-standby status.*

Not Stated in Plan

The SPCC Plan has been revised to indicate that only portable pumps are used in transfer operations. Refer to page 19 of the revised SPCC Plan.

21. *Securely cap or blank-flange loading/unloading connections of oil pipelines when not in service or on standby status for an extended time period.*

Not Stated in Plan

The SPCC Plan has been revised to indicate that there are no pipelines in operational status at the facility. Refer to page 19 of the revised SPCC Plan.

22. *Failure to provide facility lighting which is appropriate with the type and location of the facility and is adequate to discover spills.*

Not Stated in Plan

The SPCC Plan has been revised to indicate that adequate lighting is provided in each storage area. Refer to page 19 of the revised SPCC Plan.

RE: Service Welding & Ship Building
NE Canal Bank Road, Lemont, Illinois
RESPONSE TO USEPA 8/11/2000 CORRESPONDENCE

23. *(e) (10) Personnel, training and spill prevention procedures.*

Failure to properly instruct personnel in the operation and maintenance of equipment used to prevent oil discharges and in the pollution control laws, rules and regulations. Missing Daily & Weekly Procedure.

Not Stated in Plan

The SPCC Plan has been revised to indicate the training of appropriate plant personnel (those involved with product transfer operations) on all SPCC Plan procedures. Refer to page 19 -20 of the revised SPCC Plan.

24. *The SPCC Plan only covers the western peninsula. The eastern peninsula needs to be addressed.*

There are no bulk storage operations taking place within the eastern "peninsula". All storage tanks are located on the western "peninsula". Therefore the SPCC Plan only covers the bulk storage tank operations located on the western "peninsula".

WORST CASE DISCHARGE
PERSISTENT OIL {OPA GROUP 3}

Definition:

Persistent oil Group 3 means a petroleum-based oil that does not meet the distillation criteria for non-persistent oil {Group 1}, and has a specific gravity between 0.85 and less than 0.95.

WORST CASE DISCHARGE
PERSISTENT OIL {OPA GROUP 4}

Definition:

Persistent oil Group 4 means a petroleum-based oil that does not meet the distillation criteria for non-persistent oil {Group 1}, and has a specific gravity between 0.95 and 1.0.

WORST CASE DISCHARGE
PERSISTENT OIL {OPA GROUP 5}

Definition:

Persistent oil Group 5 means a petroleum-based oil that does not meet the distillation criteria for non-persisten oil {Group 1} and has a specific gravity greater than 1.0.

Group 5 spills would be identified and cleaned up by dredging.

Dredging contractors are listed below:

Evansville Materials, Inc.
PO Box 3596
900 N.W. Riverside Drive
Evansville, IN 47734
{812} 424-5583

M.T. Epling Company
1725 Eastern Avenue
Galipolis, OH 45631
{614} 446-2742

Diamond Services Corporation
503 So. DeGravelle Road
Amelia, LA 70340
{504} 631-2187

OPERATIONAL SPILL PREVENTION

I. List of products to be transferred to or from the vessel.

A. For unloading operations, consult the barge manifest for the name or names of the chemicals to be unloaded. See the Cargo Information Cards on board the vessel to obtain health, fire, and personnel safety information. Assume all chemicals are oils or hazardous materials and follow the transfer procedures outlined below unless specifically instructed that the chemical is a non-oil and non-hazardous.

B. For loading operations, consult loading plans or other instructions issued by the shore facility operator to determine the name or names of the chemicals to be loaded. Obtain information on safety, fire, and personnel safety from Cargo Information Cards or shore facility personnel before beginning transfer operations. As in Part A, assume all chemicals are oils or hazardous materials unless instructed otherwise.

II. Each operator and/or tankerman must be thoroughly familiar with the location of each valve, pump, control device, vent, and overflow.

III At no time during the transfer operations will there be less than one responsible person on duty unless authorized in writing by the COTP.

IV The certified tankerman assigned shall be in charge and responsible for the safe transfer of the cargo. His duties include, but are not limited to, the following:

1. Check and sign the DECLARATION OF INSPECTION prior to transfer.

2. Proper connection of the grounding cable.

3. Proper and tight connection of the header line hoses.

4. Checking the bow and stern rakes and all void spaces, making sure that they are dry and free of product and water.

5. Maintaining proper security of the barge while it is under his cognizance.

6. Taking all precautions to guard against the accidental discharge of oil.

7. Should an accidental discharge occur, stop transfer operations, and report the incident to the proper authorities IMMEDIATELY.

V. During transfer operations, the mooring lines will be checked and adjusted as necessary at half hour intervals. In situations where moored barges are subject to

surging due to passing vessels, or where high wind conditions exist, additional mooring lines will be used to insure a safe mooring.

VI. In the event of an emergency during unloading operations, the transfer of cargo can be stopped by pulling the remote shutdown cable. The remote engine shutdown station will be approximately 50 feet from the engine and marked by a sign indicating its location. Pull the "D" ring to shutdown the engine. Familiarize yourself with the location of the remote engine shutdown before starting the engine. Failure of a transfer hose or shore pump during loading will automatically stop the flow of oil from the barge. During transfers, approved two-way radios must be used by the tankerman-in-charge for communications purposes.

VII. In the case of a single cargo loading, tanks will be topped off according to their distance from the loading header. Tanks furthest from the leading header will be topped off first and the tanks nearest the loading header will be topped off last. The flow of oil while topping off will be controlled by the compartment valve of the compartment being finished. Definite agreement must be reached with the shore personnel concerning the rate of flow during the loading, while topping off, and for the final shutdown. Be sure that the tanks are not topped off so full that the maximum or desired draft is exceeded, and so that there is enough space to allow for the expansion of the product.

VIII. As each tank is topped off, the compartment valve should be closed and remain closed until the system is lined up for discharge at the Off-Load Port. After a tank has been finished it should be checked at frequent intervals to insure that the valve is not leading which could result in an overflow. After the loading is complete, close the loading valve and the header line valve.

IX. Should an accidental discharge of oil on the water occur, notify the National Response Center, 1-800-424-8802 {Toll Free} immediately. A fine can result from failure to notify the National Response Center in a timely manner. Please call Egan Marine Corporation, 1-708-739-0947 and ask for the Barge Dispatcher on duty.

X. During transfer operations, each cargo tank shall be vented through an open ullage, portable high level vent, or return vent depending on EPA and USCG requirements. During loading and venting through high level vent or return vent, the emergency overfill valve for that tank shall be in open position. Loading rates must be controlled to prevent opening of PV valves when high level or return venting is employed. Emergency overfill valves must be closed at all times other than during actual loading operations. Following completion of the transfer of material, all cargo tank openings must be closed and secured.

COLLISION

Should the vessel be involved in a collision with another vessel, the Master shall as soon as possible identify the extent of damage to his own vessel.

When a collision occurs, the FIRE ALARM must be sounded immediately for the personnel to muster at their designated positions in case of fire breaking out.

The following check list should assist the Master in assessing the situation.....

.....Are any tanks penetrated above or below the waterline?

.....If vessel's are dead in the water and interlocked, what is the most prudent, to stay interlocked or separate?

.....Is there any oil spill at present - small or large? Will a separation of interlocked vessels create a larger oil spill than if the vessels stay interlocked?

.....If there is an oil spill, will the separation of the vessels cause sparks that can ignite the oil or other flammable substances leaked out from the vessels?

.....Are the vessels of a greater danger to other traffic in the area if they are interlocked than if separate?

.....What is the danger of either vessel sinking when separating, if vessels have sustained serious damage to tanks below the waterline due to reduced buoyancy?

.....If the vessels are separated, how is the maneuverability of own vessel?

.....If separation of vessels take place, alter course to bring vessel upwind of any oil slick.

.....Shut down all non-essential air intake{s}.

.....Isolate penetrated tank by hermetically closing the tank if possible.

FIRE AND EXPLOSION

Should an explosion and a fire occur on board, the vessel's crew will, under the leadership of the Master, initiate the necessary steps to bring the situation under control.

Such steps will be.....

.....Find out immediately where the fire/explosion has taken place.

.....Try to determine the extent of damage, and if anyone of the compliment is injured or dead.

.....Deploy the members of the vessel's crew to the position{s} deemed best for fighting the fire.

.....Use all available means to fight the fire such as:

{a} Water with spray nozzles
{b} Water cannons
{c} Dry chemical extinguisher
{d} CO2 Extinguishers

.....Try to contain the fire and prevent it from spreading to other parts of the vessel.

The occurrence shall be reported to the U.S. Coast Guard, informing them about the situation and if the fire cannot be controlled, request outside assistance from shore based assets.

In case of fire and explosion, the following priorities exist when the Damage control measures are initiated.....

.....Rescue lives.

.....Limiting the damage to vessel and cargo.

.....Preventing environmental pollution.

When alerting the local authority and firefighting contractors, report as per IMO-format {Chapter 2}, but most important give:

.....Name of vessel and nationality.

.....Location.

FIRE AND EXPLOSION {Continued...}

.....Type of incident and cargo on board.

.....If anyone is injured or missing.

.....Any oil spill or threat of spill.

EXCESSIVE LIST

Should the vessel for some reason suddenly start to list excessively during discharge or loading operations, tank cleaning or bunkering, all ongoing operation must be stopped immediately the cause can be determined.

The Master shall inform the terminal {if applicable} by way of agreed Emergency Signal procedure.

The Master shall try to determine the reason for the excessive list, and take steps to rectify the situation.....

.....The vessel's Oil Pollution Prevention Team be called out.

.....Soundings/ullage to be taken in all tanks.

.....Cargo, bunker, and ballast pumps to be made ready.

.....If there is reason to believe that the list may cause an oil spill, notify as per Chapter 2.

.....When or if the situation is brought under control, inform as necessary.

RECORD KEEPING AND SAMPLING

The Master is responsible for keeping record of events whenever there is a spill or a substantial threat of a spill. All relevant information shall be entered, including but not limited to:

{1} When, where and what happened.
{2} Notification made and to whom.
{3} Efforts made by crew.
{4} Assistance received and by whom.
{5} Transfer of authority to Qualified Individual.

Only facts should be logged. Do not speculate as to what has happened!

If possible take pictures and/or video of important factors documenting events.

All spilled oil shall be sampled, safety permitting. Any oil observed on the water, while vessel is at anchor or berth, shall be sampled if possible. Samples shall be properly marked, with date and location, and sealed, and always be made in duplicate. Samples will be most valuable if the sampling is authenticated by someone not part of the crew, i.e., U.S. Coast Guard, Harbor Master, terminal personnel or pilot. One sample may be turned over to the U.S. Coast Guard, if requested, or to a duly authorized owner's representative {Qualified Individual}.

QUALIFIED INDIVIDUAL'S RESPONSIBILITIES

The Primary Qualified Individual{s} are:

Dennis H. Egan

The Alternate Qualified Individual{s} are:

Daniel T. Egan
Barre Nall
Robin K. Chanda

The above named individuals are representatives of Egan Marine Corporation and additional Qualified Individuals' services are available through that company.

The Qualified Individual{s} have the owner's authority to:

{a} Activate and engage in contracting with required oil spill removal organization{s};

{b} Act as liaison with predesignated Federal On-Scene Coordinator {FOSC}; and,

{c} Obligate, either directly or through prearranged contracts, any funds required to carry out all required or directed oil response activities.

The Qualified Individual{s} are also engaged by the owner to liase with the U.S.C.G. and contract resources during non-emergency times. This includes:

{a} Quarterly checkout of contract resources, including training and equipment requirements.

{b} Logkeeping of drills and training sessions involving any contract resources; and,

{c} Inform the owner of changes that may effect this response plan.

TRANSFER OF RESPONSIBILITY TO SPILL MANAGEMENT TEAM

The Master has the responsibility of implementing this plan as required until such responsibility is formally transferred to the Qualified Individual.

Once the Qualified Individual is notified, and has confirmed such notification to the Master, the Qualified Individual is in charge of all shore based response.

The Master will remain responsible "on scene" until he received notification by the Qualified Individual that he is relieved of such responsibility. This will take place when the Qualified Individual has arrived at the scene, or established a response center at or near the scene. The Qualified Individual shall notify the Master, the Federal OSC and the Owner at that time.

Transfer of responsibility to the Qualified Individual does not relieve the Master from his responsibility for the vessel, its complement and cargo. Furthermore, the Master shall continue his logkeeping and any activities required on board to ensure the safety of the complement, vessel and its cargo, as well as taking all actions required to minimize the effects of any incident.

Transfer of responsibility to the Spill Management Team should be conducted as for transfer between the Master and the Qualified Individual as outlined above.

COORDINATION WITH THE FEDERAL OSC

ROUTINE

The Qualified Individual shall maintain regular contact with the Federal OSC for all areas covered by this plan, and thereby establishing a pre-incident relationship.

DURING SPILLS

The Qualified Individual shall coordinate any response efforts with the Federal OSC.

It is important to recognize that the Federal OSC is the "auditor" of whatever actions are taken, and if he is not satisfied, he may "Federalize" the spill. This may put the owner in a situation of "gross negligence", and therefore unlimited liability.

The Qualified Individual shall keep the Federal OSC updated on developments, by providing twice daily reports, or as mutually agreed as work progresses.

The Qualified Individual shall permit the Federal OSC free access to all logs and reports, and include him in any response management meetings that may be called.

SPILL MANAGEMENT TEAM

The following management resources are available and will be mobilized as necessary:

Position	Function
Appropriate Government Agency Representative, On Scene Coordinator	In charge of all field activities, directing all cleanup activities.
Dennis H. Egan, Qualified Individual	Approve all actions, specifically those that go beyond the content of this response plan.
Donald Schlyer, Legal/Attorney	Advise on legal matters. Responsible for assuring that the owner fulfill his obligations under the relevant laws.
Robin K. Chanda, Finance	Approve and assure payment of all obligations.
Robin K. Chanda, Public Relations	Issue press releases for approval by owner's representative. Arrange interviews and field trips for the press. Assure that the press and media is correctly informed.
Barre Nall, Communications	In charge of all field communication and logging of same. Arrange for all required communication systems.
Lee Ann Angeloni, Secretarial Services	Arrange all written documentation and necessary facilities for same.
Joe Rousseau Safety	Independent position to assure that all safety regulations {including OSHA} are in compliance.
Barre Nall, Purchasing	In charge of arranging all necessary equipment and services.
Barre Nall, Manager	Contractor's manager in charge of contracted Field resources.

Dennis Egan, EMC Owner, will head the response team. His experience in spill response places him as the natural leader of any possible spill situation.

SPILL MANAGEMENT TEAM {CONTINUED...}

Don Schlyer is EMC's in house attorney and has represented this company many times. He is experienced in dealing with other members of the team and providing legal advice on adherence to laws.

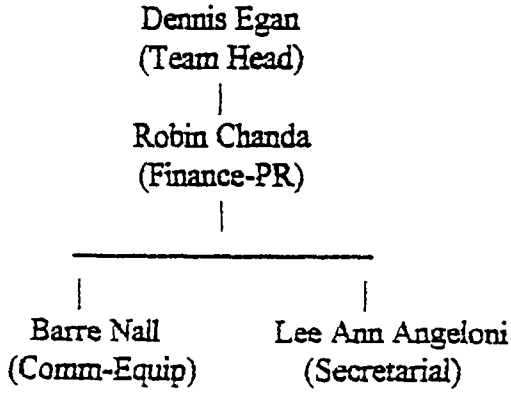
Robin Chanda, EMC Comptroller and Vice-President, will arrange for payment of all obligations, as she does on a continuing daily basis for the company. All press contacts will be directed through her.

Barre Nall, EMC Marine Operations Manager, will arrange for field communications and logging of same. He handles he communications aspects of the company as a regular job function. He will also be in charge of arranging for necessary equipment and services, including contracted resources.

Lee Ann Angeloni, EMC Bookkeeper, will handle all written documentation.

Joe Rousseau, not an EMC employee, will assure that all safety regulations are followed during operations. He has functioned in this capacity in the past for EMC.

Organizational Chart



Staff Position - Donald Schlyer (Legal)
Staff Position - Joe Rousseau (Safety)

Subordinate Teams will be comprised of EMC personnel who have prior experience in spill activities.

OWNER AND OPERATOR

Vessel Owner:	Egan Marine Corporation PO Box 669 Lemont, Illinois 60441
Business Phone:	{708} 739-0947
Fax:	{708} 739-4455
Dennis H. Egan Primary Contact	{708} 972-0948 {Home} {708} 659-6900 {Page} {708} 975-6900 {Mobile Phone}

INSURANCE REPRESENTATIVES
P & I

Egan Marine Corporation's insurance representative is:

Rollins Hudig Hall
100 North Broadway
St. Louis, MO 63102

{314} 231-0100	Main
{800} 325-7028	Toll-Free
{314} 231-0423	Fax
{314} 231-0492	24-Hour Marine Department
Anthony M. Bono, Vice President	Contact

INSURANCE REPRESENTATIVES
H & M

Egan Marine Corporation's insurance representative is:

Rollins Hudig Hull
100 No. Broadway
St. Louis, MO 63102

{314} 231-0100	Main
{800} 325-7028	Toll Free
{314} 231-0423	Fax
{314} 231-0492	24-Hour Marine Department

Anthony M. Bono, Vice President — Contact

SURVEYORS

Independent Marine Associates, Inc.
PO Box 122
Lemont, IL 60439

{708} 257-6110 Main
{708} 257-8916 Fax

C. Baxter, Jr. and Associates
906 Azalea Road
Mobile, AL 36693

{205} 660-9572 Main

GENERAL CONTRACTORS

This facility will contract with the below listed company to provide response to all classes of spills in all areas where this facility will operate:

Name:	Heritage
Address:	319 Marquette Drive Romeoville, IL 60441
24 Hour Phone:	1-800-487-7455
Fax:	{708} 378-2200

OTHER CONTRACTORS
{IDENTIFIED RESOURCES}

The facility's Qualified Individual{s} maintain a complete listing of other available oil spill clean up contractors. It is the Qualified Individual's duty to call out any of these and requests should be made through him.

Best Environmental, Inc.
PO Box 576
Channahon, IL 60410
{815} 725-1554 Main

C.E.E. Environmental Services
PO Box 1352
Paducah, KY 42002-1352
{502} 898-4052 Main
{502} 898-4648 Fax

OTHER CONTRACTORS

Ridel Environmental Services, Inc.
18207 Edison Avenue
Chesterfield, MO 63005
{800} 334-0004

Marine Pollution Control
8631 W. Jefferson
Detroit, MI 48209
{313} 849-2333

Clean Harbors
11800 So. Stony Island Avenue
Chicago, IL 60617
{312} 646-6202

TRAINING PROGRAM

The company training program is based on standards set by the statuary training requirements for the crew with additional training in oil pollution control as discussed in this plan.

Company Officers:	Receive initial training in the use of all parts of this plan that effect them and their crew, and have the responsibility of training their crew with "hands-on" operation on board. The drill program {Chapter 7} constitutes the continuous part of the training.
Crew:	The crew receive their training as part of their on board duties. Specific training in oil pollution control include the use of the on board equipment.
Qualified Individual{s}:	The Qualified Individual{s} are required to be trained in the OSHA standards for emergency response operation, and in the use of this response plan by participating in the drills required.
Staff:	The company's staff which is a part of the response management team are selected based on their knowledge of the company and vessel, and their ability to handle crisis situations. By participating in the scheduled drills, they are also training in the specifics of this plan. Any member of the staff that will be involved in oil spill clean-up {except office administration} will have completed OSHA training.
Contracted Personnel:	All personnel that may participate in an oil spill clean-up effort are required to train and maintain that training as required by 29 CFR 1910.120 {OSHA}. The vessel's contracted responder has confirmed this in the contract for the resources.

RECORDS OF TRAINING

The records of training as detailed on Page 62 shall be maintained as follows:

On Board Training	Maintained by Log on Board
Management Training	Maintained by Safety Officer
Contracted Resources Training {Summary}	Maintained by Qualified Individual

DRILLS

This plan shall be exercised as follows:

Shore The owner shall exercise the plan involving the spill management team as "tabletop drills" either in full or in part, on an annual basis assuring that the entire plan has been exercised every three years. All drills shall be logged.

The oil spill removal contracted resources are required to be drilled yearly. It is the contractor's responsibility to conduct these drills but drills shall be reported to the Qualified Individual and he will maintain the records {log} for such drills.

RECORDS OF DRILLS

The record of drills as detailed on Page 42 shall be maintained as follows:

On Board Drills	Maintained on Log on Board
Management Drills	Maintained by Safety Officer
Contracted Resources	Maintained by Qualified Individual

UPDATE PROCEDURES

This plan can only be changed and/or updated with the written authorization of:

Dennis H. Egan, Owner

All comments, corrections and suggestions shall be directed to the above named individual. All users of the plan have the responsibility of pointing out changes that effect the validity and/or use of the plan.

Major changes in the plan shall be made as soon as possible.

Any changes or updates which require a page change shall be accompanied with a new "Record of Changes" Page 3.

All approved changes shall be sent without delay to all registered copy holders as follows:

Copy Number	Location
1	Owner's Response Group
2	Safety Officer {In Charge of Update}
3	U.S. Coast Guard
4	Qualified Individual{s}
5	Qualified Individual{s}

POST-INCIDENCE REVIEW

Whenever the plan has been put in use in response to an incident, all parties directly involved shall comment on the effectiveness of the plan and its content. The responsible person shall review the comments and if needed make changes or suggest changes to the company's management.

After the completion of the review any changes made to the plan shall be logged in the Record of Changes on Page 3 of this plan.

COTP ZONES - IDENTIFICATION

The U.S. waters are divided into districts and Captain of the Port Zones {COTP} and the facility covered by this plan shall not operate in waters of a COTP zone that is not included in this plan {unless a one-time waiver has been obtained}. The following listing is from the definition of COTP zones found in 33CFR Chapter 1, Part 3. Contact numbers for each District can be found in Chapter 9.

COTP NAME	LOCATION
NINTH DISTRICT - CLEVELAND	
Cleveland	Cleveland, Ohio
Buffalo	Buffalo, New York
Detroit	Detroit, Michigan
Duluth	Duluth, Minnesota
Milwaukee	Milwaukee, Wisconsin
Sault Ste. Marie	Sault Ste. Marie, Michigan
Toledo	Toledo, Ohio
Chicago	Chicago, Illinois
Grand Haven	Muskegon, Michigan

TO REPORT ALL OIL OR HAZARDOUS MATERIAL SPILLS OR ACCIDENTS, THE NATIONAL RESPONSE CENTER MUST BE NOTIFIED BY CALLING 1-800-424-8802 AROUND THE CLOCK

Local NRC Offices	Day Number	Night Number
Corpus Christi	512-888-3162	Same
Galveston	409-766-3687	Same
Houston	713-672-6639	Same
Port Arthur	409-723-6500	Same
Morgan City	504-384-2406	504-385-2936
Houma	504-868-5595	504-385-2936
New Orleans	504-589-6221	Same
Mobile	205-690-2286	504-690-2121
Baton Rouge	504-389-0271	504-589-6221
Memphis	901-544-3941	901-544-3912
St. Louis	314-539-3823	Same
Keokuk	319-524-7511	Same
St. Paul	612-240-3991	Same
Chicago	708-789-5830	Same
Pittsburgh	412-644-5808	Same
Cincinnati	513-684-3295	Same
Louisville	502-582-5194	502-582-6439
Paducah	502-442-1628	Same
Nashville	615-736-5421	Same

CROSS REFERENCED INFORMATION

The following information is referenced in this response plan and may be located as follows:

Item	Location		
	Aboard	Home Office	Qualified Individual
Company/Facility Operation Manual	X	X	X
Vessel to Vessel Transfer Guide	X	X	X
Marpol 73/78	X	X	
33CFR Part 155		X	
Damaged Stability Data and Class		X	
Duty Contact List	X	X	X

SAFETY/HAZARDS FOR CARGO/FUEL

Safety and hazard information regarding the cargo and fuel carried on board the vessel is available on board vessel.

EGAN MARINE CORPORATION
MOBILE FACILITY
OPERATIONS MANUAL

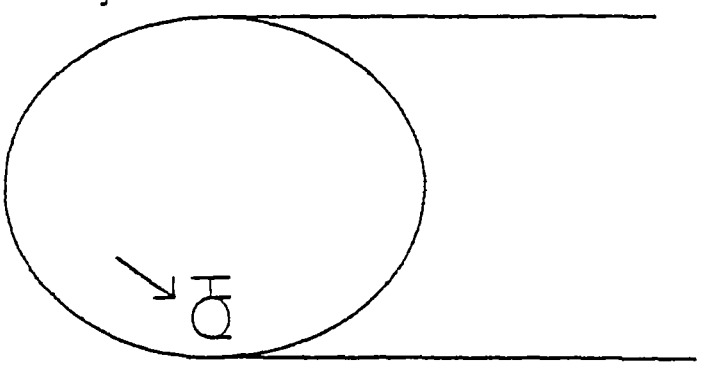
OPERATIONS MANUAL
EMC MOBILE FACILITY

PHYSICAL DESCRIPTION

Transfers will be between standard tanker trucks and tank barges. Two (2) ABC Fire Extinguishers will be on site during operations. Life preservers and jackets will also be on site and ready for use.

CONTROL STATION

The transfer control will be by the valve located at the rear of the truck tank.



HOURS OF OPERATION

The facility will be capable of operation 24 hours a day, 7 days a week, as needed when barges or trucks are to be received.

SIZES; TYPES; NUMBER OF VESSELS

Individual barge size will be 7,500 Bbls to 50,000 Bbls. All units will be tank barges. Mobile facility will have the ability to deal with two barges at one time.

PHYSICAL CHARACTERISTICS

(i) The products transferred are Soybean Oil, Soapstock, and Tallow.

(ii) (a) The name of the products are:

1. Soybean Oil - Soyabean
2. Soapstock - Soapstock
3. Tallow - Tallow

(b) Description of the product is:

1. pale yellow liquid
2. pale yellow liquid
3. dark yellow liquid

(c) The odor of the products are:

1. weak odor
2. weak odor
3. waxy odor

(d) Heated tallow can burn eyes and skin. No other handling hazards.

(e) Follow normal safety procedures. Gloves needed for handling hot hoses.

(f) If leak or spill occurs, stop pumping. Contain spill. Scoop up or cover liquid with absorbent.

(g) For fire use foam, water, or carbon dioxide. Water may be ineffective, use for cooling exposed containers.

DOCKMAN DUTIES/PROCEDURES

The minimum number of men on duty on shore during pumping will be one (1), anytime loading/unloading is in progress. duties include pre-transfer and during transfer check of:

1. Vessel moorings (156-120-A)
2. Transfer hoses; length (156-120-B-C)
3. Transfer system; alignment (156-120-D)
4. Transfer hoses; blanked (156-120-E-F)
5. Transfer hoses; condition (156-120-I-J)
6. Transfer system; leak-free at facility (156-120-P)
7. Communication system and language fluency (156-120-Q-V)
8. Emergency shutdown procedures (156-120-R)
9. Sufficient personnel with training (156-120-S-T-U)
10. Agreement to begin transfer (156-120-W-X)
11. Transfer connections (156-130)

EMERGENCY TELEPHONE NUMBERS

The following telephone numbers are the people to contact in an emergency:

Egan Marine Corporation	708-739-0947
Dennis Egan	708-972-0948
Daniel Egan	708-972-1116
Barre Nall	815-722-8516
Coast Guard NRC	800-424-8800
Coast Guard M.S.O.	708-789-5830 7:00am - 3:30pm 414-747-7190 4:00pm - 7:30am
Coast Guard Milwaukee	414-747-7181 3:30pm - 7:00am
Fire Department (Lemont)	911
Illinois EPA	708-345-9780

COMMUNICATIONS

Continuous two-way voice communication between the person in charge of the vessel transfer and the person in charge of facility transfer is via portable radio device. Radios are intrinsically safe as defined in 46 CFR 110.15-100(i) and meet class I, Group D requirements as defined in 46 CFR 111.80.

DRIP AND DISCHARGE COLLECTION

Collection of product discharge and drip will be by a five (5) gallon bucket located under the valve on the truck tank.

EMERGENCY SHUTDOWN SYSTEMS

During truck to barge transfers, product movement will initially be by portable pump and will be continued by gravity. Should an emergency arise, transfer can be halted by closing the discharge valve on the truck.

During barge to truck transfers, product movement will be by barge cargo pump. Should an emergency arise, transfer can be stopped by use of the emergency shutdown cable located on the barge.

CONTAINMENT EQUIPMENT

Absorbent material will be available to personnel for small spills on dock or barge. This will include individual 16 1/2" x 20" absorbent pads, each capable of 32 oz. of absorption and two (2) 8" x 10' sections of absorbent boom, for immediate containment of any spillage into canal. Containment equipment for immediate use will be located at an area within 5 minutes of deployment. In the event of a possible release of product into waterway, one section of 8" x 10' boom would be placed at the front and rear of barge, extending from barge to dock face wall. This would prevent product from moving up or down stream. Absorbent pads would then be used to absorb product, until professional remediators are on site. Heritage is located all through the Chicago area for quick response.

FIRE EXTINGUISHERS

Two (2) CO_2 fire extinguishers will be on site and will be readily available to personnel. To use them, pull the pin and direct the hose to the base of the fire. Squeeze the handle to release the contents.

MAXIMUM SYSTEM PRESSURE

The maximum system pressure is rated 150 psi.

"PROCEDURES FOR":

Transfer of product will not commence until each person in charge designated under 154.710 and 154.700 has filled out and signed the declaration of inspection form described in paragraph (c) of 156.150. No person in charge may sign declaration unless he or she has determined by inspection, and indicated by initialing in the appropriate space on form. Once transfer is ready to commence, and each person on vessel and shore are ready to receive product, valve on truck is opened and transfer is initiated. Facility and vessel keep constant contact via two-way radio.

After product transfer is complete, tank truck valve is closed and is evacuated of any product while still connected to barge header. Once emptied of product, hose is disconnected from barge header and immediately blanked while over barge spill pan.

TANK TRUCK OIL TRANSFER PROCEDURES

1. Personnel Required – This tank truck is to be attended by one qualified person and a barge side counterpart who is a U.S.C.G. Licensed Tankerman with appropriate grade as required by the U.S.C.G. Captain of the Port.
2. Duties – The assigned qualified person shall be in charge and:
   A.) Make or supervise all cargo connections connecting to the tanker.
   B.) Make frequent checks and perform minor maintenance on the transfer pump and engine when in use. This is to include but not limited to:
      1.) Pump packing
      2.) Engine oil and fuel levels, water temperature, oil pressure, RPM, etc.
   C.) Ensure truck / tanker has brakes locked / engaged and / or tires chocked
3. Voice communications between barge tankerman and shore personnel should be maintained at all times.
4. Topping-off tanker: No tanker is to be loaded higher than bottom of hatch trunk lip.
5. **Emergency**– Follow Emergency Responce Plan posted on tanker:
   IN CASE OF DISCHARGE OR THREAT OF DISCHARGE
      1. PROTECT HUMAN LIFE
      2. CONTACT THE EGAN MARINE OWNER / OPERATOR / QUALIFIED INDIVIDUAL AT **1-708-739-0947**
      3. CONTACT THE NATIONAL RESPONCE CENTER AT **1-800-424-8802**
      4. STOP AND / OR CONTAIN DISCHARGE– IF IT CAN BE DONE WITHOUT ENDANGERING HUMAN SAFETY.

TANK TRUCK DISCHARGE PROCEDURE CHECKLIST

___ Fill out and sign the Declaration of Inspection.

___ Ensure tractor / tanker has brakes locked / engaged and / or tires chocked.

___ Open top hatch or other suitable method of venting.

___ Connect the hose to the tankers discharge piping using proper gasket and fastening components.

___ Check communications system to make sure instructions can be understood clearly by everyone before commencing the transfer.

___ While transfer is progressing - Stay alert for leaks at connections and position of hose.

___ Upon completion of transfer close all valves, disconnect the hose and blind / cap accordingly using proper gasket and appropriate fastening components.

___ Before embarking, the tanker should be secured as follows:

A.) Dog all hatches, vents, etc.

B.) Drain and wipe clean as necessary all discharge containment systems.

C.) Secure booms, cargo hose and any other gear that is not a permanent part of the tanker.

TANK TRUCK LOADING PROCEDURE CHECKLIST

___ Fill out and sign the Declaration of Inspection.

___ Ensure tractor / tanker has brakes locked / engaged and / or tires chocked.

___ Open top hatch or other suitable method of venting.

___ Connect the hose to the tankers loading piping system using proper gasket and fastening components.

___ Check communications system to ensure instructions can be understood clearly by everyone before commencing the transfer.

___ While transfer is progressing - Stay alert for leaks at connections and proper position of hose.

___ Upon completion of transfer close all valves, disconnect the hose and blind / cap accordingly using proper gasket and appropriate fastening components.

___ Before embarking, the tanker should be secured as follows:

A.) Dog all hatches, vents, etc.

B.) Drain and wipe clean as necessary all discharge containment systems.

C.) Secure booms, cargo hose and any other gear that is not a permanent part of the tanker.

EMERGENCY PHONE NUMBERS

In the event of an emergency, cellular communication will be used to contact Egan Marine Corporation office, followed by Coast Guard, NRC, and fire departments if need be.

CONTAINMENT PROCEDURE

In case of a spill in the water immediate containment would be handled by EMC and consists of the following:

Initial containment of any spillage into the canal would consist of placing sections of absorbent boom at the front and rear of vessel, extending from dock face wall to vessel. Absorbent pads and pillows would be used to absorb product until professional remediators arrive on site. Simultaneously the following contacts would be made as needed:

1 - Coast Guard National Response Center	800-424-8800
2 - Coast Guard 7:30am - 4:00pm	708-789-5830
4:00pm - 7:30am	414-747-7190
3 - Egan Marine Corporation	708-739-0947
4 - Heritage	708-385-0515
5 - Fire department (if required)	911
6 - EPA	708-345-9780

Federal Regulations prohibit the discharge of oil in harmful quantities in or on any waters of the United States. Harmful quantity has been defined as sufficient oil to create a sheen. Presently, penalties up to $10,000.00 are assessed by the Coast Guard for any person, firm or corporation who causes a discharge. Included in this act, is the provision for the Coast Guard to conduct cleanup action and later bill the polluter if the polluter is slow or delinquent in the cleanup of a pollution incident.

Other provisions of this Act include the extension of Coast Guard jurisdiction. That is, oil spilled on any waters of the United States is subject to this Act and the Coast Guard's enforcement of the Act. Also, there is a referral provision for possible criminal prosecution for any person who fails to immediately notify the Coast Guard of a spill. This is, of course, providing the person is in charge of the activities that produced the spill.

State Laws pertaining to water pollution are enforced by the Illinois Environmental Protection Agency. Although the State of Illinois claims jurisdiction over all Illinois rivers, streams and waterways relative to discharging of polluting materials to these waters, they have not attempted to duplicate the efforts of the U.S. Coast Guard of the Metropolitan Sanitary District in the surveillance of oil transfers and the arrest and prosecution of those accused of spilling oil or other hydrocarbon liquids accidentally or otherwise to the Sanitary and Ship Canal. They are more concerned with discharges which affect the quality of water as opposed to spillages which have only a temporary effect.

The Metropolitan Sanitary District of Greater Chicago has in its books a Sewage and Waste Control Ordinance. This ordinance is to provide for abatement and prevention of pollution by regulating and controlling the quantity and quality of sewage and industrial wastes admitted to or discharged into the sewage systems, sewage works and natural outlets under the jurisdiction of the Metropolitan Sanitary District of Greater Chicago. Hereinafter to be known as "The Sewage and Waste Control Ordinance". Approved and adopted by the board of trustees of the

Metropolitan Sanitary District of Greater Chicago on September 18, 1969.

This ordinance, promulgated by the Metropolitan Sanitary District of Greater Chicago, hereinafter called the Sanitary District, has as it purpose the protection of the public health and safety by abating and preventing pollution through the regulation and control of the quantity and quality of sewage and industrial wastes admitted to or discharged into the sewage systems, sewage works, waters, water courses and natural outlets under the jurisdiction of the Sanitary District.

Whoever fails to comply with an order of the Sanitary District issued in pursuance of this ordinance, shall be fined $100.00. Each day's continuance of such failure is a separate offense. The penalties so imposed are recoverable by the Sanitary District upon its suit, as debts are recoverable at law.

PROCEDURES FOR LIGHTING

Portable lighting will be directed such that it does not interfer with water traffic. Lights will be pointed away from the river whenever possible. When not possible, shutters will be used to direct the light in a manner so that boats will not be hingered.

PERSONS IN CHARGE

(a) No person may serve, and the facility operator may not use the services of a person, as person in charge of facility transfer operations unless:

All persons in charge have been designated so by facility operator.

All persons will have in excess of 48 hours of experience in transfer operations.

Persons in charge know the hazards of each product to be transferred; rules in parts 145, and 156; facility operating procedures as described in operations manual; vessel transfer systems, in general; each facility transfer system to be used; local discharge reporting procedures; the facility's contingency plan for discharge, reporting, and containment.

Persons In Charge:

Dennis Egan
Daniel Egan
Barre Nall
Joseph Rogers
Robert Wondowlowski
John Harmon
Andrew Chanda
William Rodgers
Tom Renardo, Sr.

Informational records of all Persons In Charge are available at the Egan Marine Corporation office.

Drills

Drills will be scheduled in accordance with 33 CFR 154.1050.

Monthly - Facility personnel and qualified individual notification drills.

Semiannually - Facility equipment deployment drills

Yearly - Spill management team tabletop drill.

Annual - Unannounced drill during which the spill removal organizational and spill management team shall be activated.

ATTACHMENT 6:

Written Commitment of Resources

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont, Illinois

SPCC PLAN -- COMMITMENT OF RESOURCES
(9/2001)

I hereby certify that the enclosed SPCC Plan was prepared under my direction and supervision and that I am familiar with the provisions of the SPCC Plan developed for the Service Welding and Ship Building Bulk Storage Plant Operations.

I additionally certify that Service Welding and Ship Building will commit the necessary resources (manpower, equipment and materials) required to expeditiously control and remove any harmful quantity of oil discharged as outlined within the enclosed SPCC Plan.

Dennis Egan, Owner
Name/Title

9-24-01
Date

Signature

ATTACHMENT 7:

Inspection Procedures and Forms

SERVICE WELDING
N.E. CANAL BANK ROAD, LEMONT, ILLINOIS
SPCC PLAN - ATTACHMENT 7

DAILY INSPECTION REQUIREMENTS – 9/2001

GENERAL FACILITY PREMISES

AT BEGINNING OF EACH WORK DAY

A. Check Fence, gates and signs for good repair and signs being present.

B. Check buildings for unauthorized entries, damage and missing equipment.

C. Check emergency equipment - fire extinguishers are present and have covers on them (outdoor extinguishers).

D. All trucks and trailers on the property to be checked for leaks.

E. Barge transfer area for irregularities?

F. Alarm Systems/Communications Systems accessible and working?

G. Are good housekeeping practices being observed?

H. Report all problems to your supervisor and take corrective action as necessary.

TANK FARMS

EVERY WORK DAY (Both at the start and end of your shift).

A. Visually inspect the tank farm for changes, since your last inspection.
Specifically check for:
   a. Are all tanks' valves properly closed?
   b. Are any tanks' valves leaking?
   c. Are temperature of the tanks within their proper ranges?
   d. Tank construction any erosion, corrosion, leaking fittings seams?
   e. Area surrounding tank -- look for signs of leaks?
   f. Any noticeable defects in secondary containment devices?

B. Visually inspect the barge transfer area.

C. Inspect all areas to insure that good housekeeping is maintained.

D. Fill out Inspection Forms at the End of the Day, if necessary.

E. Report all problems to your supervisor and take corrective action as necessary.

SERVICE WELDING
N.E. CANAL BANK ROAD, LEMONT, ILLINOIS
SPCC PLAN - DAILY INSPECTION SCHEDULE -- 9/2001

DATE:_____ INSPECTOR:_____ SIGNATURE:_____

ITEM	INSPECTION ELEMENT/TYPE OF PROBLEM	COMMENTS	
		Description of Problem Noted	Repairs Implemented/Date
GENERAL ITEMS			
Fence	*Inspect entire perimeter for breaches or damage.		
Gates	*Check for proper gate lock function.		
Buildings	*Check for unauthorized entries, damage, and missing equipment.		
SAFETY & EMERGENCY EQUIPMENT			
Alarm Systems	*Check accessibility.		
	*Check for proper operation.		
Internal/External (Phone and Radio) Communication Systems	*Check accessibility.		
	*Check for operation		
Fire Extinguishers	*Check accessibility, present		
TANK STORAGE INSPECTION			
GENERAL AREAS	*Check for evidence of spills or releases in unloading area(s)		
	*Check for removal of spill absorbent and cleanup materials		
	*Inspect vacuum tanker hoses for deterioration or leakage		
	*Inspect containment system(s) for deterioration		
	*Check for cracks and gaps in base, dike, and sumps		

SERVICE WELDING
N.E. CANAL BANK ROAD, LEMONT, ILLINOIS
SPCC PLAN - DAILY INSPECTION SCHEDULE -- 9/2001

ITEM		INSPECTION ELEMENT/TYPE OF PROBLEM	COMMENTS	
			Description of Problem Noted	Repairs Implemented/Date
		*Check for evidence of seepage outside containment (e.g. discoloration)		
		*Check for debris, cleanup residue, improperly stored equipment		
		*Inspect exterior for cracks, leaks, discoloration, and obvious deformation		
Boiler Fuel Tanks (Primary Storage)	B-1 Thru B-4	**Access Hatches, Vents, and Sampling Ports** - *Check for leaks *Check for damage **Fill/Drain and Overflow Piping** - *Inspect piping for leaks *Inspect valve seals for leaks *Check that handles are not bent or damaged **Tank Integrity** - *Inspect exterior for cracks, leaks, discoloration, and obvious deformation **Liquid Levels** - *Check if operators log book is up to date *Check liquid tank levels **All Ancillary Equipment** - *Visual inspection for leaks		
Boiler Fuel Tanks (Emergency Backup)	U1-U22			
Fuel Tanks	8			
	9			
	10			
Product Tanks - Temp. Storage	40-1 Thru 40-7			

SERVICE WELDING
N.E. CANAL BANK ROAD, LEMONT, ILLINOIS

SPCC PLAN (9/2001) - ATTACHMENT 7
WEEKLY INSPECTION PROCEDURES

In the addition to the daily inspection, a more detailed (logged) weekly inspection is to be conducted. The items listed below are to be checked to ensure that there is no potential release of materials into the environment, that all safety and emergency equipment is present and operational, that all materials and secondary containment systems are structurally sound, that all monitoring equipment is operating and recalibrated as required, that all processing equipment is in good working order, and that security structures and signs are present and intact.

ITEMS TO BE CHECKED:

Security Structures

1. Fence
2. Gates
3. Warning signs

Containment and Secondary Containment

1. Tanks
2. Truck Unloading Area(s)
3. Barge Transfer Area

Safety Equipment

1. First Aid Stations
2. Emergency Shower
3. Eye Wash Station
4. Personal Protective Equipment

Emergency Equipment

1. Fire Extinguishers
2. Alarm System
3. Spill Control Materials (Boom, Pads, Oil- Dri, etc.)

Monitoring Equipment

1. Temperature Gauges
2. pH Meters
3. Tank Levels (Manual)

Processing Equipment

1. Pumps
2. Heavy Equipment
   a. Bobcat
   b. End Loaders
   c. Backhoe
   d. Bulldozer

REPORT ALL PROBLEMS TO YOUR SUPERVISOR AND TAKE ACTION AS NEEDED - ATTACHED FORMS ARE TO BE USED

SERVICE WELDING
N.E. CANAL BANK ROAD, LEMONT, ILLINOIS
SPCC PLAN - WEEKLY INSPECTION SCHEDULE -- 9/2001

DATE:_____ INSPECTOR:_____ SIGNATURE:_____

ITEM	INSPECTION ELEMENT/TYPE OF PROBLEM	DESCRIPTION OF PROBLEM	DESCRIPTION OF REPAIRS/DATE
	GENERAL ITEMS		
Lighting System	*Check lights for operability.		
	SAFETY & EMERGENCY EQUIPMENT		
Protective Gear(e.g., Helmets, Goggles, Boots, Gloves, Disposable suits, Disposable Bags)	*Check accessibility.		
	*Check for adequate supply.		
	*Check for deterioration, damage.		
Breathing Apparatus (e.g., Half-Face Respirators, *Cartridges*)	*Check for accessibility. *Check for adequate supply, full charge on canisters, and all air tanks.		
	*Check for deterioration and damage. *Check for function.		
First Aid Kits	*Check accessibility. *Check for adequate supply.		
Portable Eyewash	*Check accessibility. *Check for adequate supply.		
Water Lines	*Check for adequate pressure.		
Fire Extinguishers	*Check pressure gauge for full charge indication. *Check inspection tag to insure annual maintenance by outside fire service is up-to-date.		
	*Check seal to ensure no one has used extinguisher. *Check for deterioration.		
	*Check for adequate supply. *Check accessibility.		

SERVICE WELDING
N.E. CANAL BANK ROAD, LEMONT, ILLINOIS
SPCC PLAN - WEEKLY INSPECTION SCHEDULE -- 9/2001

ITEM	INSPECTION ELEMENT/TYPE OF PROBLEM	DESCRIPTION OF PROBLEM	DESCRIPTION OF REPAIRS/DATE
Absorbent Supply	*Check for adequate supply.		
Recovery Drums	*Check for adequate supply.		
Other Emergency and Decontamination Equipment	*Check accessibility. *Check for proper operation . *Check for deterioration/damage.		
Pumps	*Check for proper operation. *Inquire with maintenance department.		
Heavy Equipment	*Check for proper operation. *Inquire with maintenance department.		

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont Illinois

SPCC PLAN (9/2001) - ATTACHMENT 7

ANNUAL TANK INSPECTION

DATE:_____

PERFORMED BY:_____

ORDERED BY:_____

TANK NO:_____

VISUAL INSPECTIONS

ITEMS:	COMMENTS:
A: EXTERIOR:	
LADDER: (RUNGS, ANCHORS)	
EXTERIOR OF VESSEL:	
ROOF:	
INSULATION:	
B: INTERIOR:	
MANWAY: (COVER & GASKETS)	
FLOOR: (WELDS)	
WALLS: (WELDS)	
COILS: (TEST UNDER PRESSURE)	
C: VALVES:	
PACKING:	
MANUAL OPERATION:	
TEST VALVES UNDER PRESSURE:	
AJOINING PIPING UNDER PRESSURE:	
D: VENTS:	
VAC:	
PRESSURE:	
PRESSURE RELIEF VALVES:	

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont Illinois

SPCC PLAN (9/2001) - ATTACHMENT 7

VISUAL / ANNUAL TANK INSPECTION INSTRUCTIONS

Tank must be empty and cleaned before this inspection.
When inspecting the tank all confined space entry regulations must be followed, refer to Safety Manual.
Tank to have continuous LEL/0_2 monitoring during inside inspection.
All valves on the inlet and discharge must be secured closed before entry to tank.
When making visual inspection record all rust, pitting , cracks. discolored paint (which may indicate leaks) in the comment space provided.
all comment area's are to be filled out; Example (Exterior or vessel) if tank is insulated, indicate it is.

Additional Comments:

_____ _____

_____

_____

_____

_____

_____

_____

Reviewing Supervisor _____

ATTACHMENT 8:

Training Log Forms

SERVICE WELDING AND SHIP BUILDING
NE Canal Bank Road, Lemont Illinois

SPCC PLAN (9/2001) - ATTACHMENT 8

TRAINING LOG RECORDS

EMPLOYEE NAME:_____

POSITION:_____

HIRED DATE:_____

DATE	TYPE OF TRAINING	* SIGNATURE / SUPERVISOR - (TRAINER)	*SIGNATURE / EMPLOYEE

* The signature confirms that the employee has received the appropriate training as outlined in the SPCC Plan.